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COPY

IN THE MATTER OF)
COUNTY ROAD 10 LANDFILL) VOLUME I
(HIMCO DUMP))

The sworn statement of JERRY D. PERRIN,
called as a witness by Miles Inc., taken before
Rosemary J. Bell, CSR, RPR, a Notary Public in
and for the County of St. Joseph and State of
Indiana, at Barnes & Thornburg, 305 Ameritrust
National Bank Building, 301 South Main Street,
Elkhart, Indiana, on Tuesday, September 15,
1992, commencing at the hour of 8:37 a.m..

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1 **APPEARANCES:**

2 **MR. REED S. OSLAN**
3 **Kirkland & Ellis**
4 **200 East Randolph Drive**
5 **Chicago, Illinois 60601**

6 **Appeared on behalf of Miles Inc.;**

7 **MR. RICHARD W. PAULEN**
8 **Barnes & Thornburg**
9 **305 Ameritrust National Bank Building**
10 **301 South Main Street**
11 **Elkhart, Indiana 46516**

12 **Appeared on behalf of HIMCO WASTE-AWAY**
13 **SYSTEMS, INC.**

14 **ALSO PRESENT:**

15 **MR. RICHARD WINCHELL**
16 **MR. R. LENNIE SCOTT**

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E X H I B I T

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1 JERRY D. PERRIN,
2 called as a witness, having been first duly
3 sworn, was examined and testified as follows:

4 EXAMINATION

5 BY MR. OSLAN:

6 Q. Mr. Perrin, my name is Reed Oslan. I'm with the
7 Kirkland & Ellis law firm, and we represent
8 Miles in relation to the County Road 10 Landfill
9 Superfund Site or what is otherwise called by
10 the government as the HIMCO Dump Superfund
11 Site.

12 Today we are taking your statement to
13 provide a record of what you recall, what you
14 remember, about various customers of HIMCO
15 WASTE-AWAY SERVICES and otherwise the County
16 Road 10 Landfill.

17 I will be asking you a series of
18 questions and will be requesting you to answer
19 those questions. If at any time you do not
20 understand a question that I ask you, then I
21 certainly would appreciate it if you would ask
22 me to rephrase the question. If you don't ask
23 me to rephrase a question, then we will all
24 assume that you understood the question.

25 Certainly at any point in time if you

1 have the need for a break, just let me know and
2 we'll take a break. We can see how things go.

3 First let me ask you your full name.

4 A. Jerry D. Perrin.

5 Q. Mr. Perrin, where do you currently reside?

6 A. 30931 Dogwood Drive, Osceola.

7 Q. How long have you lived at that address?

8 A. Twenty some years. Twenty-two years, I believe.

9 Q. Who is your current employer?

10 A. Earthmovers, Incorporated.

11 Q. And what business is Earthmovers, Incorporated,
12 currently engaged in?

13 A. Landfilling.

14 Q. What is your position with Earthmovers?

15 A. Superintendent of operations.

16 Q. Does Earthmovers have one primary location that
17 they're currently operating?

18 A. Yes, County Road 26.

19 Q. Is that a landfill?

20 A. Yes, sir.

21 Q. How long have you worked at Earthmovers --
22 strike that.

23 How long have you worked for
24 Earthmovers?

25 A. I believe 22 years.

- 1 Q. Okay. To whom do you report at Earthmovers?
- 2 A. Charles Himes, Jr.
- 3 Q. Now, I understand that at one point in time you
- 4 worked at the County Road 10 Landfill that is
- 5 the subject of the case that we are involved in;
- 6 is that correct?
- 7 A. Yes, sir.
- 8 Q. When did you first become employed at County
- 9 Road 10?
- 10 A. I believe it was around October 1968. Or '78,
- 11 excuse me.
- 12 Q. '78 or '68?
- 13 A. '68. '68. That's it.
- 14 Q. Okay. What was the name of the company that
- 15 hired you in October of 1968?
- 16 A. Charles Himes and Sons.
- 17 Q. What was the relationship between Charles Himes
- 18 and Sons to the County Road 10 Landfill at that
- 19 time?
- 20 A. I believe they were the operators of the
- 21 landfill.
- 22 Q. In October of 1968 what position did you take
- 23 with Charles Himes and Sons at the County Road
- 24 10 Landfill?
- 25 A. I started out as a part-time bulldozer

1 operator.

2 Q. How long did you serve as a part-time bulldozer
3 operator?

4 A. Probably three weeks.

5 Q. And then did you become a full-time --

6 A. Yes, sir.

7 Q. -- employee?

8 A. Yes, sir.

9 Q. In addition to bulldozing duties, did you have
10 other duties at the County Road 10 Landfill or
11 otherwise for Charles Himes and Sons?

12 A. Yes, sir.

13 Q. And what were those duties?

14 A. Well, I would drive truck on weekends. And if
15 they needed a truckdriver during the week and I
16 had time, I would pick up a few loads of trash
17 myself.

18 Q. In addition to your duties as a bulldozer
19 operator, you also -- strike that.

20 In addition to your duties as a
21 bulldozer operator, you also went to customers
22 of the landfill and picked up their waste; is
23 that correct?

24 A. That's correct.

25 Q. When was it that you stopped working for Charles

1 Himes and Sons at County Road 10? What year was
2 that?

3 A. Nineteen seventy -- I believe around October
4 1976.

5 Q. Now, from October of 1968 to October of 1976,
6 were you working for Charles Himes and Sons both
7 as a bulldozer operator and from time to time as
8 a driver that would pick up waste from
9 customers?

10 A. Yes, sir.

11 Q. During the eight years that you worked at County
12 Road 10, did you become familiar with the
13 Charles Himes and Sons customers that were
14 utilizing the County Road 10 Landfill?

15 A. Yes, sir.

16 Q. And did you become familiar with the various
17 types of businesses that Charles Himes and Sons
18 would service?

19 A. Yes, sir.

20 Q. Both through picking up the waste and disposing
21 of it at the County Road 10 Landfill?

22 A. Yes, sir.

23 Q. Also during the eight-year period that you
24 worked at County Road 10, did you become
25 familiar with the types of waste that particular

1 customers would dispose of at the County Road 10
2 Landfill?

3 A. Yes, sir.

4 Q. And did you become familiar to the extent that
5 you could distinguish between certain loads of
6 waste so that you could tell whether they came
7 from a particular customer as opposed to another
8 customer?

9 A. Yes, sir.

10 Q. I want to back up a little bit. In 1968 when
11 you first started working at County Road 10,
12 roughly how many employees did Charles Himes and
13 Sons have at that time?

14 A. I believe three.

15 Q. And what were these three employees doing in
16 terms of job responsibilities?

17 A. Two were pretty much truckdrivers and then
18 myself as an operator at the landfill site.

19 Q. How many trucks did Charles Himes and Sons -- is
20 it also accurate to call that HIMCO, or is that
21 a different company?

22 A. It's accurate, yes.

23 Q. So how many --

24 A. That's correct.

25 Q. -- trucks did HIMCO have in October of 1968?

1 A. I believe two -- two load luggers and one packer
2 truck and probably four small little side
3 loaders. I think two of them were dump-bed
4 pickup trucks and two of them were those side
5 loaders for house-to-house pickup.

6 Q. Would you describe what a load lugger is.

7 A. Well, in my explanation it would be a medium-
8 size truck that would have arms on it that raise
9 and lower with chains hanging on them and they
10 would pick up a 8-yard container, a 16-yard
11 container, and a 22-yard container.

12 Q. What is a packer truck?

13 A. A packer truck is a -- well, they're a large
14 truck, and the arms hang over the front of the
15 cab and they would pick up like a 2-yard, a
16 4-yard, a 6-yard. And I believe at that time
17 the hospital had what we called an 8-yard
18 container. It was a special built one. And you
19 pick it up and dump it over the top, and it has
20 a ram on the inside and it compresses the trash
21 into the truck so that you can get more on it.

22 Q. What is a side loader?

23 A. Well, a side loader was just a smaller truck
24 that if you went to a house-to-house stop you
25 could pick up their barrel or their trash can

1 and dump it in the side. And it also had a
2 little ram inside that would push the trash back
3 so you could do it by hand.

4 Q. There were two small dump trucks?

5 A. Yes.

6 Q. Would you just generally describe those.

7 A. Well, they were just a small type pickup truck
8 but the bed had a hydraulic ram on it that would
9 raise and you could dump the trash on.

10 Q. During the eight-year period that you were
11 employed by HIMCO at County Road 10, did they
12 acquire additional trucks --

13 A. Yes, sir.

14 Q. -- over the years?

15 And could you describe the types of
16 additional trucks that they acquired and the
17 relative time period when they were acquired.

18 A. Well, they acquired, I think, two new lugger
19 trucks, and they also acquired a new roll-off,
20 and then we bought a used roll-off for a backup.

21 Q. Okay. Did they purchase any additional trucks
22 during that eight-year period that you can
23 recall?

24 A. Yes, I think we probably put on another packer
25 truck also in that time frame.

1 Q. You first mentioned two additional trucks were
2 luggers. Do you happen to recall when those
3 were acquired?

4 A. I would say in the early seventies.

5 Q. Okay. You stated that HIMCO acquired a new
6 roll-off. First of all, what's a roll-off?

7 A. A roll-off is rather a large truck that has a
8 cable on it and rails that run down the truck,
9 and you would hydraulically release this cable,
10 pull it on, hook it onto a hook on the front of
11 the roll-off container, and then you could
12 literally pull it up onto the truck.

13 Q. How large typically was the roll-off container?

14 A. I would say -- they were tandem axles, and you
15 could probably haul 40 to 50 thousand pounds on
16 them or better.

17 Q. In terms of cubic yards, how large were the
18 containers for the roll-offs?

19 A. There were 30 yards and 42 yards. Then
20 eventually we went to 48 yards. And I think in
21 today's standard you can get them to 50 yards.

22 Q. But prior to 1968 -- I'm sorry.

23 Prior to 1976 the largest lugger
24 container that HIMCO worked with was a 48; is
25 that correct?

1 A. No, sir. You got trucks mixed up. A roll-off
2 would be -- probably 48 yards was the biggest we
3 had in that time period.

4 Q. Okay.

5 A. You said lugger.

6 Q. Okay. So the largest roll-off you had prior to
7 October '76 was 48 yards?

8 A. Yes, sir.

9 Q. When did HIMCO purchase the new roll-off that
10 you referred to?

11 A. There again I believe it would be in the early
12 seventies.

13 Q. You also mentioned that HIMCO purchased a used
14 roll-off truck as backup primarily. Do you
15 recall when that truck was purchased?

16 A. It was shortly after the new truck was
17 purchased, and there again I would say the early
18 seventies.

19 Q. And the final additional truck that you
20 mentioned was a packer truck. Do you happen to
21 know when that truck was purchased?

22 A. I'd say the early seventies also.

23 MR. OSLAN: Why don't we take a minute
24 or two break.

25 (Whereupon a short recess was

1 taken.)

2 MR. OSLAN: Back on the record.

3 BY MR. OSLAN:

4 Q. Mr. Perrin, I was just looking at my notes.

5 Could you describe the distinction between the
6 business called Charles Himes and Sons and the
7 business called HIMCO WASTE-AWAY SERVICES.

8 A. Yes, sir. To the best of my belief, Charles
9 Himes and Sons was actually a kind of a cartage
10 business. Mr. Himes had some trucks that he
11 delivered freight around town. And he also at
12 that time owned the property or run the landfill
13 for HIMCO WASTE-AWAY.

14 Q. Okay. And when you say "at that time," what
15 year did Charles Himes and Sons own or operate
16 the County Road 10 Landfill?

17 A. Well, it would have been in 1968 when I started
18 there so --

19 Q. Okay. So at least as of 1968, Charles Himes and
20 Sons owned or operated the County Road 10
21 Landfill and also operated a cartage business?

22 A. Yes, sir.

23 Q. And was the cartage business also a business
24 that picked up waste and brought it to the
25 landfill?

1 A. No, sir.

2 Q. That was a separate business?

3 A. Yes.

4 Q. Okay. Now HIMCO WASTE-AWAY SERVICES, what
5 business was that company in, say, roughly, in
6 1968?

7 A. They were picking up refuse to go to the
8 landfill.

9 Q. So HIMCO WASTE-AWAY SERVICES was in effect the
10 transporter of waste to the site?

11 A. Yes, sir.

12 Q. And Charles Himes and Sons operated the site?

13 A. Yes, sir.

14 Q. And that's in 1968?

15 A. Yes, sir.

16 Q. I want to back up and further discuss your
17 background and your involvement at the
18 landfill.

19 You said that you started part time
20 just for a very short period of time in October
21 of 1968. After the part-time three-week period,
22 you became a full-time employee; is that
23 correct?

24 A. Yes, sir.

25 Q. And then you continued to be a full-time

1 employee all the way from roughly November or
2 late October of 1968 to October of 1976; is that
3 correct?

4 A. Yes, sir.

5 Q. During that period of time as a full-time
6 employee, how many hours on average would you
7 work per week either at the landfill or serving
8 as a driver of trucks picking up waste and
9 taking it to the site?

10 A. I believe it would average about 50 to 55
11 hours.

12 Q. When you were working as a bulldozer operator at
13 the property, at the County Road 10 Landfill
14 itself, what did that involve? What were you
15 doing?

16 A. Well, as the trucks would back in and dump their
17 loads, then I would take the bulldozer and break
18 the loads apart and spread them out and make
19 them level and put some dirt on top of it so as
20 the next load of trash that came in, he could
21 back up a little farther. And it was kind of
22 marshland, and we were filling in kind of a
23 lowland area.

24 Q. When the truckdrivers came in with loads of
25 waste, did you understand or did you know where

1 the trucks were coming from?

2 A. Many of them, yes, sir.

3 Q. Okay. And did you have discussions with the
4 truckdrivers, for example, that would allow you
5 to know where the waste came from?

6 A. Yes, sir.

7 Q. During the period that you were bulldozing at
8 the site, did you become familiar with certain
9 containers that would allow you to know where
10 the container came from?

11 A. Yes, sir.

12 Q. And did you also become familiar with types of
13 waste that you would find in a container so that
14 you would know where the waste came from?

15 A. Yes, sir.

16 Q. Now, when you were serving as a truckdriver and
17 picking up waste from customers and taking that
18 waste to the landfill, would you describe the
19 process that you went through in terms of
20 contacting the customer or them contacting you
21 and describe generally how the waste got to the
22 landfill.

23 A. Well, I would just go in to the main office and
24 pick up a lugger truck or a roll-off truck or
25 packer truck, whatever the case may be that the

1 load was, and I would just do like a regular
2 driver, drive out and pick up. And in some
3 cases we would have to sign a ticket or have the
4 ticket signed that we picked a load up, and
5 usually there was someone around that probably
6 was filling the trash container with trash and
7 he would just sign the ticket. On a lot of them
8 we wouldn't even have to do that. When we
9 picked up the load, we might leave a ticket but
10 it wouldn't have to be signed. And some of them
11 we didn't do anything, picked up the load of
12 trash and took it back and it was recorded on
13 the logbook.

14 Q. Did HIMCO have customers that would be serviced
15 on a regular basis?

16 A. Yes, sir.

17 Q. So that for certain customers at least, a truck
18 would go to their facility in a defined
19 interval, once a week or once every day?

20 A. Yes, sir.

21 Q. And did you become familiar with which companies
22 those were? In other words, did you know which
23 companies were on a regular pickup basis?

24 A. Quite a few, sir.

25 Q. And of course HIMCO also had customers that were

1 not on a regular schedule, I assume?

2 A. That's correct.

3 Q. How would those customers let HIMCO know that
4 they had waste that needed to be picked up?

5 A. It's what we call a call-in basis.

6 Q. Okay. So they simply would call HIMCO and say,
7 "Our container is full, please pick it up"?

8 A. Yes.

9 Q. And then you would send out a truckdriver or
10 yourself would go and you'd pick up that waste
11 and take it to the site?

12 A. Yes, sir.

13 Q. Was this the general nature of the business
14 during the entire period of time that you worked
15 there from October of '76 to October of '68?

16 A. Yes, sir.

17 Q. I got those dates wrong. Let me ask that
18 question again.

19 Was the general nature of the business
20 at HIMCO essentially the same between October of
21 '68 and October of 1976?

22 A. Yes, sir.

23 MR. OSLAN: Why don't we go off for
24 just a second.

25 (Discussion held off the record.)

1 BY MR. OSLAN:

2 Q. Mr. Perrin, you mentioned earlier a dispatch
3 book or a ledger book. Would you describe the
4 types of records that were generated or were
5 created at the County Road 10 Landfill that
6 describe where wastes were coming from or who
7 customers were of the landfill.

8 A. Well, it's a pretty large ledger book with
9 probably 150 lines on it. And we would take a
10 corner of the ledger book and, say, at the top
11 right-hand corner would be load lugger stops, in
12 the center might be the roll-off stops, and the
13 right-hand side of the book might be for
14 front-end loaders or house-to-house pickups.

15 And if a customer -- at the end of the
16 day you knew that you had certain customers that
17 you had to pick up each day. You would write
18 that down. And then when the driver come in in
19 the morning, you knew you had those stops, you
20 would start him out there. And then if a
21 call-in came in for a load lugger at 8:15, you
22 would say whatever the customer's name was and
23 write down that he called in at 8:15 a.m. Once
24 the driver picked up that container and dumped
25 it and returned it, then he would call dispatch

1 and say I'm done with such and such customer,
2 and we would log that time down that at 8:45 the
3 job was completed, the container was returned,
4 and dispatch him to his next stop, whatever it
5 might be.

6 And on the front-end loaders, if they
7 were on a regular basis, say Monday, Wednesday,
8 and Friday, but the container was full on
9 Tuesday, they could call in, and we knew which
10 driver was close to that area, and we could run
11 him by there and they would pick that container
12 up, dump it, and at that time they'd probably
13 leave them an extra ticket so we would get paid
14 for the extra.

15 And basically that's how it was run.
16 The times were logged that they called and the
17 times were logged that they were completed.

18 Q. Was this ledger book the primary document that
19 HIMCO recorded its customer transactions in?

20 A. Yes, sir.

21 Q. And is it your understanding that the ledger
22 book included all transactions of a given day?

23 A. Yes, sir.

24 Q. Were there any other documents that were created
25 by HIMCO that you can recall related to County

1 Road 10 Landfill other than this ledger book?

2 A. The driver had a little note pad or a little
3 ledger of his own that if the customer so
4 desired, we would leave them a copy that on such
5 and such a date we were there and picked up your
6 container so there's a record of it. And that
7 would be matched against the ledger.

8 Q. Can you think of any other documents that were
9 created back at County Road 10 that might
10 reflect customer transactions?

11 A. No, sir.

12 Q. You mentioned that when you became employed at
13 County Road 10 there were three employees. Did
14 HIMCO hire additional employees to work at
15 County Road 10 prior to your leaving there in
16 October of 1976?

17 A. Yes, sir.

18 Q. Roughly how many additional employees were hired
19 by HIMCO prior to October of '76 at County Road
20 10?

21 A. For operating the landfill, one besides myself.

22 Q. Did HIMCO also hire additional drivers?

23 A. Yes, sir.

24 Q. Approximately how many additional drivers did
25 HIMCO hire prior to October 1976?

- 1 A. I would say probably 10.
- 2 Q. What was the name of the person that was the
3 other employee operating the site, if you
4 recall?
- 5 A. Kenny Bender, Joe Cashen, Mike McKinney, Jake
6 Thompson. By name that's -- that's all I can
7 think of right offhand.
- 8 Q. Those four people, were those both drivers and
9 people helping in the operation of the site?
- 10 A. No, sir.
- 11 Q. These were all people that operated the site?
- 12 A. Right.
- 13 Q. Do you know whether any of these four people are
14 around the city of Elkhart?
- 15 A. Not to my knowledge.
- 16 Q. Do you recall any of the names of the 10 drivers
17 that were employed by HIMCO in October of 1968?
- 18 A. Joe Cashen -- I mean Joe Eli, John Eli, Kenny
19 Twa, Denny Price, Ralph Easch. That's about the
20 best I can do right now.
- 21 Q. You've identified five drivers and four people
22 that helped in the operation of the site. Do
23 you believe that any of these people have more
24 knowledge about the HIMCO operations and HIMCO's
25 customers and their wastes than yourself?

1 A. No, sir, I do not.

2 Q. So you believe that you have the most complete
3 knowledge about customer transactions and wastes
4 that were generated by customers and disposed of
5 at County Road 10; is that correct?

6 A. Yes, sir.

7 Q. Of the nine individuals you've named, were they
8 all working at HIMCO at the same time, or was it
9 the case where some of them worked there for
10 short periods of time and then others came on to
11 take on their role?

12 A. At HIMCO they were all there at the same time.
13 At the landfill itself, they were there at
14 different times.

15 Q. Okay.

16 A. Some of them were even part time.

17 Q. So at the landfill itself where you identified
18 four people as operating, they were all working
19 there with you?

20 A. Yes, sir.

21 Q. But with respect to the drivers, they would come
22 in and go out?

23 A. Yes, sir.

24 Q. So in October of 1976 were there 10 drivers or
25 did you identify 10 drivers that worked there

1 sometime prior to October of 1976?

2 A. No, sir, I would say there would have been 10
3 drivers at that time.

4 MR. OSLAN: Okay. I'd like to have
5 the court reporter mark this document as Exhibit
6 1.

7 (Exhibit No. 1 marked for
8 identification.)

9 BY MR. OSLAN:

10 Q. Mr. Perrin, I'm handing you what's been marked
11 Exhibit 1, and I will tell you that it is a list
12 of some of the customers that used the landfill
13 at County Road 10 or otherwise were customers of
14 HIMCO.

15 And what I would like to do now is to
16 begin going through each customer and I will ask
17 you a series of questions about each one and
18 we'll just see what you recall. Okay?

19 A. Yes, sir.

20 Q. The first company on the list is 501 Associates
21 Building at 501 West Bristol Street.

22 Are you familiar with that company?

23 A. Yes, sir.

24 Q. What is the business of 501 Associates Building?

25 A. To my knowledge it's just an office building.

1 Q. Do you recall 501 Associates Building sending
2 waste or shipping waste to the landfill?

3 A. No, sir.

4 Q. You do not?

5 A. (Witness shakes head.)

6 Q. Okay. The second company on the list is AACOA
7 at 727 Randolph.

8 Are you familiar with AACOA?

9 A. Yes, sir.

10 Q. What type of business is AACOA in?

11 A. They were -- to the best of my recollection,
12 made roofing for the mobile home industry.

13 Q. Okay. Did HIMCO pick up waste from AACOA?

14 A. Yes, sir.

15 Q. Did HIMCO dispose of waste at the County Road 10
16 Landfill that came from AACOA?

17 A. Yes, sir.

18 Q. Are you familiar with the types of waste that
19 AACOA generated from 1968 to 1976?

20 A. Yes, sir.

21 Q. Did AACOA generate scrap metals?

22 A. Yes, sir.

23 Q. Did AACOA dispose of or generate old ingots?

24 A. No, sir.

25 Q. How about rust-stripping solutions?

- 1 A. No, sir.
- 2 Q. Okay. Now about oils and rags?
- 3 A. I would say yes, sir.
- 4 Q. What other types of waste do you recall AACOA
5 disposing of at County Road 10?
- 6 A. Scrap aluminum, steel bandings, wood,
7 cardboard.
- 8 Q. Can you recall any other waste that AACOA
9 disposed of at the landfill?
- 10 A. No, sir.
- 11 Q. Do you recall the size of the container that
12 AACOA used to dispose of its waste at the
13 landfill?
- 14 A. I believe it was a load lugger size container,
15 which would probably be in the 16- to 22-yard
16 range.
- 17 Q. Do you recall the frequency of shipments from
18 AACOA to the landfill, the pickups?
- 19 A. I would say possibly twice a week.
- 20 Q. The next company is Ace Cab of Elkhart, Inc., at
21 300 East High Street.
- 22 Are you familiar with Ace Cab?
- 23 A. Yes, sir.
- 24 Q. What type of business was Ace Cab?
- 25 A. Taxicab service.

1 Q. Did Ace Cab do its own automobile maintenance?
2 A. Yes, sir.
3 Q. Did waste from Ace Cab get disposed of at the
4 County Road 10 Landfill?
5 A. Yes.
6 Q. Are you familiar with the types of waste that
7 Ace Cab disposed of at the County Road 10
8 Landfill?
9 A. Yes, sir.
10 Q. What types of waste do you recall Ace Cab
11 generating?
12 A. They would clean their cabs out. They would
13 service their cabs. There was probably oil
14 filters, air cleaners, possibly a battery or two
15 once in a while, and just normal trash.
16 Q. Did Ace Cab also use and dispose of solvents?
17 A. No, sir, not to my knowledge.
18 Q. How about automobile fluids, brake fluids and
19 that type of thing?
20 A. I would say a possibility from doing the work in
21 their garage, yes.
22 Q. Old tires?
23 A. Yes, sir.
24 Q. Okay. Do you recall any other types of waste
25 that Ace Cab disposed of at the landfill?

1 A. No, sir.

2 Q. The next company is Acme General Corporation --
3 I'm sorry, let me go back to Ace Cab for just a
4 minute.

5 What size container did Ace Cab have
6 for disposing of its waste?

7 A. I believe it was a 3-yard container.

8 Q. And do you recall approximately how frequently
9 its container would be emptied at the landfill?

10 A. I believe they were once a week.

11 Q. The next company is Acme General Corporation,
12 and the address I have is P. O. Box 518.

13 Are you familiar with Acme General?

14 A. No, sir.

15 Q. The next company is Adams & Westlake Co. at --

16 A. Yes, sir.

17 Q. -- 940 North Michigan Street.

18 Are you familiar with Adams & Westlake
19 Company?

20 A. Yes, sir.

21 Q. What type of business was Adams & Westlake
22 Company in during the period that you worked at
23 the landfill?

24 A. Adams & Westlake were in the metal-fabricating
25 business.

1 Q. Did Adams & Westlake dispose of -- strike that.
2 Did Adams & Westlake dispose of their
3 waste at the County Road 10 Landfill?
4 A. Yes, sir.
5 Q. Are you familiar with the types of waste that
6 Adams & Westlake generated?
7 A. Yes, sir.
8 Q. Did Adams & Westlake generate scrap metals?
9 A. Yes, sir.
10 Q. Did Adams & Westlake generate cutting oils?
11 A. Yes, sir.
12 Q. Did Adams & Westlake use and dispose of solvents
13 or cleaning solutions?
14 A. Possibility.
15 Q. How about paint and primers, did Adams &
16 Westlake dispose of that type of waste at the
17 landfill?
18 A. I can't recall.
19 Q. Did Adams & Westlake use degreasers and dispose
20 of degreasers?
21 A. Strong possibility.
22 Q. You believe they did?
23 A. Yes, sir.
24 Q. And machining oils, did they use and dispose of
25 machining oils?

- 1 A. Yes, sir.
- 2 Q. Did Adams & Westlake have a foundry?
- 3 A. Yes, sir.
- 4 Q. Did Adams & Westlake dispose of foundry sand at
5 the landfill?
- 6 A. Yes, sir.
- 7 Q. Did Adams & Westlake use any acids to your
8 knowledge?
- 9 A. Not to my knowledge.
- 10 Q. Okay. Can you recall any other types of waste
11 that were disposed of at the County Road 10
12 Landfill that were the result of Adams &
13 Westlake's operations?
- 14 A. Well, I'm sure their office paper and such was
15 because it would be in the container right along
16 with the metals and floor shavings.
- 17 Q. Okay. Do you recall any other industrial waste
18 that was disposed of at the landfill by Adams &
19 Westlake?
- 20 A. No, sir.
- 21 Q. What size container did Adams & Westlake Company
22 have at their facility?
- 23 A. I believe they were at the 16- and 22-yards.
24 The foundry sand I think was an 8-yard
25 container.

1 Q. Was the foundry sand a separate container?

2 A. Yes.

3 Q. How frequent would waste be picked up from the
4 16- to 22-yard container at Adams & Westlake
5 Company?

6 A. To the best of my knowledge, once, twice a
7 week.

8 Q. With respect to the 8-yard container for foundry
9 sand disposal, how often would that be taken to
10 the landfill?

11 A. I would say on the average of once a week.

12 Q. The next company I have is Air Equipment Sales &
13 Service at P. O. Box 4311.

14 Are you familiar with that company?

15 A. Yes, sir.

16 Q. What type of business are they in?

17 A. They have air compressors and ran air
18 compressors and air lines and all air equipment,
19 spray guns.

20 Q. Did waste from Air Equipment Sales & Service get
21 disposed of at the County Road 10 Landfill
22 during the period that you worked there?

23 A. Yes, sir.

24 Q. What types of waste do you recall -- strike
25 that.

1 Did you become familiar with the types
2 of waste they generated?

3 A. Yes, sir.

4 Q. What types of waste did they dispose of at the
5 landfill?

6 A. Mostly used air hoses and office paper and maybe
7 a little wood from the skids of air compressors
8 being shipped in.

9 Q. Do you recall any other types of waste that were
10 disposed of at the landfill that came from Air
11 Equipment Sales & Service?

12 A. No, sir.

13 Q. What size container did they have?

14 A. I believe they had a 4-yard.

15 Q. And do you recall how frequently that container
16 would be emptied?

17 A. I believe that would be on a once a week basis
18 also.

19 MR. OSLAN: Okay. Why don't we take a
20 break.

21 (Whereupon a short recess was
22 taken.)

23 BY MR. OSLAN:

24 Q. The next company on the list is called All Phase
25 Electric. The address I have is P. O. Box 938.

1 Are you familiar with that company?

2 A. Yes, sir.

3 Q. What type of company is that?

4 A. They repair electric motors.

5 Q. Did they dispose of their waste at the County
6 Road 10 Landfill?

7 A. I believe so.

8 Q. Did you become familiar with the types of waste
9 they disposed of at the landfill?

10 A. Yes, sir.

11 Q. What types of waste do you recall All Phase
12 Electric disposing of at the landfill?

13 A. Well, mostly usually electric cords and
14 cardboard and wood from motors being shipped
15 in. And they might have -- if they took the
16 inner windings of the motor, they might throw
17 away the case or the end off the motor where the
18 shaft stuck into the bearing.

19 Q. So you believe they disposed of old motor parts
20 at the landfill?

21 A. That's correct.

22 Q. How about scrap wiring?

23 A. Yes, sir.

24 Q. Do you recall All Phase Electric disposing of
25 oily rags at the site?

1 A. Yes, sir.

2 Q. Do you recall any other types of waste that All
3 Phase Electric disposed of at the site?

4 A. No, sir.

5 Q. What size container did All Phase Electric have?

6 A. There again, I believe they were in the 3- to
7 4-yard range.

8 Q. Approximately how often did their container get
9 disposed -- I'm sorry.

10 How often did their container get
11 emptied at the landfill?

12 A. I would say there again about once a week.

13 Q. The next company I have is called Allied
14 Signal. Are you familiar with that company?

15 A. No, sir.

16 Q. Okay. The next company I have is Alum-A-Form
17 Company at 2040 Industrial Parkway.

18 Are you familiar with Alum-A-Form?

19 A. Yes, sir.

20 Q. What type of company is Alum-A-Form?

21 A. They were manufacturing siding for the mobile
22 home industry.

23 Q. Did Alum-A-Form dispose of its waste at the
24 landfill?

25 A. Yes, sir.

1 Q. Did you become familiar with the types of waste
2 that Alum-A-Form disposed of at the landfill?
3 A. Yes, sir.
4 Q. What types of waste do you recall Alum-A-Form
5 disposing of at the landfill?
6 A. Scrap aluminum, steel bands, skids, cardboard.
7 Q. Okay. Did Alum-A-Form do any painting or
8 priming, anything like that?
9 A. Not to my knowledge.
10 Q. Do you recall any other types of waste that they
11 disposed of at the landfill?
12 A. No, sir.
13 Q. What size container did Alum-A-Form have?
14 A. I think they were the 16- to the 22-yard at that
15 time.
16 Q. Approximately how frequently was their container
17 emptied?
18 A. I would say once or twice a week.
19 Q. The next company is Amax Aluminum/Mill Products
20 at 1400 West Bristol Street.
21 Are you familiar with that company?
22 A. Yes, sir.
23 Q. What type of business was that?
24 A. They also manufactured siding for the mobile
25 homes.

- 1 Q. Did they use the County Road 10 Landfill to
2 dispose of their waste?
- 3 A. Yes, sir.
- 4 Q. Did you become familiar with the types of waste
5 that they disposed of at the landfill?
- 6 A. Yes, sir.
- 7 Q. Did they dispose of scrap metal at the landfill?
- 8 A. Yes, sir.
- 9 Q. Oily rags?
- 10 A. Yes, sir.
- 11 Q. Did they do any painting at Amax Aluminum?
- 12 A. Not to my knowledge.
- 13 Q. Okay. Do you recall them using solvents or
14 cutting oils?
- 15 A. No, sir.
- 16 Q. What other types of waste do you recall Amax
17 disposing of at the County Road 10 Landfill?
- 18 A. Banding products or paper, wooden skids.
- 19 Q. What was the size of the container that Amax
20 had?
- 21 A. There again, I believe they were 16 to 22.
- 22 Q. How frequently would their container be emptied?
- 23 A. Once or twice a week.
- 24 Q. The next company is American Formed Products --
25 I'm sorry, American Formed Plastics at 700 West

1 Beardsley.

2 Are you familiar with that company?

3 A. Yes, sir.

4 Q. What kind of business were they in?

5 A. Well, they form molded plastic extrusions.

6 Q. Do you recall that American Formed Plastics

7 disposed of their waste at the landfill?

8 A. Yes, sir.

9 Q. Did you become familiar with the types of waste

10 they disposed of at the landfill?

11 A. Yes, sir.

12 Q. Did they dispose of scrap plastics?

13 A. Yes, sir.

14 Q. How about scrap foam or rubbers?

15 A. Not that I recall.

16 Q. Okay. Did they dispose of glues or epoxies at

17 the landfill?

18 A. A possibility.

19 Q. Okay. How about solvents or plastic adhesive

20 solutions?

21 A. Strong possibility.

22 Q. Okay. Do you believe they did?

23 A. Yes.

24 Q. How about paints or dyes, did they use those

25 items and dispose of those wastes?

- 1 A. Yes.
- 2 Q. Okay. So you believe that American Formed
3 Plastics did dispose of paints and dyes at the
4 landfill?
- 5 A. I believe they call them pigments.
- 6 Q. Pigments?
- 7 A. To get colors.
- 8 Q. And they disposed of pigment-type wastes at the
9 landfill?
- 10 A. Yes.
- 11 Q. Did they use machining oils and dispose of
12 machining oils at the landfill?
- 13 A. Not to my knowledge.
- 14 Q. How about degreasers, did they use any
15 degreasers?
- 16 A. Not to my knowledge.
- 17 Q. What other types of waste do you recall American
18 Formed Plastics disposing of at the landfill?
- 19 A. There again, they would have cardboard, office
20 paper, and their skids.
- 21 Q. What size container did they have?
- 22 A. I believe they also had a 16.
- 23 Q. And approximately how often would their
24 container be emptied?
- 25 A. On the range of once to twice a week.

1 Q. The next company is American Home Improvement at
2 1705 South Main Street.

3 Are you familiar with that company?

4 A. Yes, sir.

5 Q. What type of business are they in?

6 A. Construction, siding, roofing,.

7 Q. Did American Home Improvement dispose of their
8 waste at the County Road 10 Landfill?

9 A. Yes, sir.

10 Q. Did you become familiar with the types of waste
11 that American Home Improvement disposed of at
12 the landfill?

13 A. Yes.

14 Q. What types of waste did they dispose of at the
15 landfill?

16 A. Mostly wood and maybe some siding, maybe old
17 shingles.

18 Q. Was this aluminum siding?

19 A. Some could have been.

20 Q. Metal siding of some sort?

21 A. Yeah.

22 Q. Did they dispose of scrap metals at the site?

23 A. Yes. I would say maybe like along the edge of
24 roofs and so on where the drip rail and then you
25 lay your shingles, yes, there would have been

1 some metals in there.

2 Q. How about used cutting oils?

3 A. No, sir.

4 Q. Oily rags?

5 A. Not to my knowledge.

6 Q. Do you recall any other types of waste that
7 American Home Improvement disposed of at the
8 landfill?

9 A. Well, I guess I would think on some of their
10 roofing projects around the chimneys and so on
11 they possibly used the tar and empty buckets of
12 possibly tar.

13 Q. Okay. How about sealers, chemical sealers for
14 roofing?

15 A. Not to the extent I would have noticed.

16 Q. Okay. Do you recall any other types of waste
17 that American Home Improvement disposed of at
18 the landfill?

19 A. No, sir.

20 Q. What type of container did they have?

21 A. I believe they would use it on a call-in basis.
22 They might have a 4-yard up to 8-yard, maybe a
23 16-yard, depending on what the job was.

24 Q. And approximately how frequently would you pick
25 up or empty containers at American Home

1 Improvement?

2 A. I believe at American it was a call-in basis.

3 Q. So it varied?

4 A. Uh-huh. Yes, sir.

5 Q. On the average approximately how often would it
6 have been?

7 A. I suppose in the summer months maybe once a week
8 when the construction business was good.

9 Q. The next company is American Plastics of
10 Elkhart, Inc., at Plant #2, U.S. Highway 20
11 West.

12 Are you familiar with that company?

13 A. Yes, sir.

14 Q. And what type of company is American Plastics of
15 Elkhart?

16 A. Well, they were in the plastic extrusion
17 business also.

18 Q. Okay. Did they dispose of their waste at the
19 County Road 10 Landfill?

20 A. Yes, sir.

21 Q. Did you become familiar with the types of waste
22 they generated?

23 A. Yes, sir.

24 Q. Did they dispose of scrap plastics?

25 A. Yes, sir.

1 Q. How about scrap foam?

2 A. Not to my knowledge.

3 Q. Okay. Did they dispose of glues and epoxies at

4 the landfill?

5 A. A strong possibility.

6 Q. Do you believe they did?

7 A. Yes.

8 Q. Did they dispose of solvents or plastic epoxy

9 solutions?

10 A. Yes.

11 Q. Okay. Paints and pigments or dyes?

12 A. Yes.

13 Q. So they did dispose of paints, pigments, and

14 dyes at the landfill?

15 A. Yes.

16 Q. How about machining oil?

17 A. Not to my knowledge.

18 Q. Okay. Degreasers?

19 A. Not to my knowledge.

20 Q. Okay. Do you recall any other types of waste

21 that American Plastics of Elkhart disposed of at

22 the landfill?

23 A. Cardboard, banding, old skids, and normal office

24 paper.

25 Q. What size container did American Plastics of

1 Elkhart have?

2 A. I believe they had the 16- or 22-yard.

3 Q. Approximately how often would their container be
4 emptied?

5 A. About twice a week.

6 Q. The next company is Anco Products at 2500 South
7 17th Street.

8 Are you familiar with that company?

9 A. Yes, sir.

10 Q. What type of business was Anco in?

11 A. They produced insulation for piping such as
12 pipes and so on.

13 Q. Did Anco Products dispose of their waste at the
14 County Road 10 Landfill?

15 A. Yes, sir.

16 Q. What types of waste did they dispose of at the
17 landfill?

18 A. I would say cardboard, fiberglass insulation,
19 and wire, skids.

20 Q. Do you know what types of wire? Was it copper
21 wire?

22 A. No, it was steel wire. I would call it spring
23 wire.

24 Q. Okay. Did they dispose of any solvents or
25 cutting oils or --

1 A. Not to my knowledge.

2 Q. Can you recall any other types of waste that
3 Anco Products disposed of at the landfill?

4 A. No, sir.

5 Q. What size container did Anco Products dispose of
6 its waste in?

7 A. I believe they had a 22-yard, and then I believe
8 they went to the bigger container, with the
9 stationary packer.

10 Q. What size was the larger container?

11 A. They were probably 42 yards in those days.

12 Q. Approximately how frequently would their
13 container be emptied?

14 A. Two to three times a week.

15 Q. The next company is Anderson Automotive at 1607
16 Elkhart Road.

17 Are you familiar with that company?

18 A. No, sir.

19 Q. The next company is Anton Interiors at 23972
20 Cooper Drive.

21 Are you familiar with that company?

22 A. Yes. I believe they were a drapery
23 manufacturer.

24 Q. Did Anton Interiors dispose of their waste at
25 the County Road 10 Landfill?

- 1 A. Yes.
- 2 Q. What types of waste do you recall?
- 3 A. Just scrap cloth and cardboard, office paper.
- 4 Q. Do you recall any other waste from Anton
- 5 Interiors?
- 6 A. No, sir.
- 7 Q. What size container did they have?
- 8 A. I believe they had a 4-yard container.
- 9 Q. Approximately how often would the Anton
- 10 Interiors container be emptied?
- 11 A. Once or twice a week.
- 12 Q. The next company is Armstrong WT Company at --
- 13 A. Yes.
- 14 Q. -- 1000 Industrial Parkway.
- 15 Are you familiar with Armstrong?
- 16 A. Yes, sir.
- 17 Q. What type of company is Armstrong?
- 18 A. Band manufacturer.
- 19 Q. Did Armstrong dispose of its waste at the County
- 20 Road 10 Landfill?
- 21 A. Yes, sir.
- 22 Q. Did you become familiar with the types of waste
- 23 that they disposed of at the landfill?
- 24 A. Yes, sir.
- 25 Q. Did they use -- strike that.

1 Did they dispose of soldering agents
2 and fluxes?

3 A. Yes, sir.

4 Q. Did they dispose of buffing wheels?

5 A. Yes, sir.

6 Q. Did they dispose of scrap metals and brass?

7 A. Yes, sir.

8 Q. Did they dispose of solvents and lacquers,
9 paints?

10 A. Yes, sir.

11 Q. Did they dispose of thinners, paint thinners?

12 A. Empty cans, yes.

13 Q. With residue?

14 A. Yes.

15 Q. How about cutting oils, did Armstrong dispose of
16 cutting oils at the landfill?

17 A. No, sir.

18 Q. Okay. Did Armstrong also dispose of the typical
19 office waste?

20 A. Yes, sir.

21 Q. What types of other waste do you recall
22 Armstrong disposing of at the landfill there?

23 A. Again there would probably be some wood from
24 skidding and banding products, plastic or metal
25 mainly.

- 1 Q. What size container did Armstrong have?
- 2 A. I believe they had a 16-yard.
- 3 Q. How often would their container be emptied?
- 4 A. They were in the once or twice a week range,
- 5 however the business was.
- 6 Q. The next company is Arnold Engineering at 300
- 7 North West Street in Marengo, Illinois.
- 8 Are you familiar with that company?
- 9 A. No, sir.
- 10 Q. The next company is Arrow Tool, Inc., at 2610
- 11 Sterling.
- 12 A. Yes, sir.
- 13 Q. Are you familiar with that company?
- 14 A. Yes, sir.
- 15 Q. What kind of business is Arrow Tool in?
- 16 A. They were a tooling manufacturer. And I believe
- 17 they had a small foundry.
- 18 Q. Did Arrow Tool dispose of its waste at the
- 19 County Road 10 Landfill?
- 20 A. Yes, sir.
- 21 Q. Did you become familiar with the types of waste
- 22 that they disposed of at the landfill?
- 23 A. Yes, sir.
- 24 Q. What types of waste did they dispose of at the
- 25 landfill?

- 1 A. Well, they had some foundry sand and they had
2 some drilling -- metal drillings from --
- 3 Q. So scrap metal?
- 4 A. Right.
- 5 Q. How about paints or primers, did they dispose of
6 paints or primers at the site?
- 7 A. Not to my knowledge, no, sir.
- 8 Q. How about cutting oils?
- 9 A. Yes, sir.
- 10 Q. Did Arrow Tool dispose of solvents or cleaning
11 solutions at the landfill?
- 12 A. Yes, sir.
- 13 Q. Did Arrow Tool dispose of degreasers at the
14 landfill?
- 15 A. Not to my knowledge.
- 16 Q. Okay. How about oily rags?
- 17 A. Yes, sir.
- 18 Q. You mentioned they were a foundry. Did they
19 dispose of old ingots at the landfill?
- 20 A. Strong possibility. I would say yes. Yes, sir.
- 21 Q. Do you recall any other types of waste that
22 Arrow Tool disposed of at the landfill?
- 23 A. No, sir.
- 24 Q. What size container did Arrow Tool have?
- 25 A. I believe that they were in a 4- or 6-yard size

1 container.

2 Q. Approximately how frequently would their
3 container be emptied?

4 A. I would say once to twice a week.

5 MR. OSLAN: Okay. Let's take a short
6 break.

7 (Whereupon a short recess was
8 taken.)

9 BY MR. OSLAN:

10 Q. We were talking about Arrow Tool. One question
11 that I neglected to ask you with respect to the
12 companies that we've talked about thus far is
13 are you aware of any companies other than HIMCO
14 picking up waste from any of the companies that
15 you recall thus far that we've talked about?

16 A. No, sir.

17 Q. Okay. And you're not aware of any other
18 locations for the disposal of waste from any of
19 those companies, are you?

20 A. No, sir.

21 Q. Okay. I think we had completed Arrow Tool, Inc.
22 The next company is Atlantic Richfield
23 Company, Indiana Toll Road SA #5 North.

24 Are you familiar with that company?

25 A. Yes, sir.

- 1 Q. What do they to do?
- 2 A. That's on the Indiana Toll Road, and they were a
3 service station.
- 4 Q. Automobile maintenance?
- 5 A. Yes, sir. There were two of them. You had the
6 north and the south side.
- 7 Q. And did Atlantic Richfield dispose of its waste
8 both from the north and south side locations at
9 the County Road 10 Landfill?
- 10 A. Yes, sir.
- 11 Q. Did you become familiar with the types of waste
12 that Atlantic Richfield disposed of at the
13 landfill?
- 14 A. Yes, sir.
- 15 Q. And did that include used automobile fluids?
- 16 A. Yes, sir.
- 17 Q. Did that include used batteries?
- 18 A. Yes, sir.
- 19 Q. Did that include used tires?
- 20 A. Yes, sir.
- 21 Q. Did that include used solvents?
- 22 A. Yes, sir.
- 23 Q. Did that include used cleaning solutions or
24 degreasers?
- 25 A. Yes, sir.

1 Q. Okay. Did they also dispose of oily rags?

2 A. Yes, sir.

3 Q. Okay. Do you recall any other types of waste
4 that Atlantic Richfield disposed of at the
5 County Road 10 Landfill?

6 A. Just their regular normal paperwork from running
7 the office.

8 Q. Are you aware of any company that picked up
9 their waste other than HIMCO?

10 A. No, sir.

11 Q. So that you believe they disposed of all of
12 their waste during the time that you worked at
13 the landfill at County Road 10?

14 A. Well, to clarify that a little bit, I'm sure
15 that if they drained the oil out of their
16 automobiles, they didn't -- there was somebody
17 that must have picked it up, their used motor
18 oil, because they didn't dump that. I might get
19 the five quarts of motor oil that they dumped
20 into the car after they -- but they didn't ship
21 their drained oil out to the landfill.

22 Q. Okay. What size container did Atlantic
23 Richfield have at its two locations?

24 A. I believe 4 yards.

25 Q. Four yards at both?

1 A. Uh-huh.

2 Q. How often would their containers be emptied and
3 their waste be disposed of at the landfill?

4 A. I believe they were twice a week, sir.

5 Q. The next company is Atlas Steel Rule and Die at
6 2000 Middlebury Street.

7 Are you familiar with that company?

8 A. Yes.

9 Q. What business is Atlas Steel Rule and Die in?

10 A. They were a small foundry and a die shop.

11 Q. Did Atlas Steel Rule and Die dispose of its
12 waste at the County Road 10 Landfill?

13 A. Yes, sir.

14 Q. Did you become familiar with the types of waste
15 they disposed of at the landfill?

16 A. Yes, sir.

17 Q. You mentioned that they had a foundry. Did they
18 dispose of foundry sand at the landfill?

19 A. Yes, sir.

20 Q. What other types of waste did they dispose of at
21 the landfill? Wood products?

22 A. Yes, sir.

23 Q. Okay. Did they also use wood preservers or
24 creosote?

25 A. Not to my knowledge, no, sir.

1 Q. How about wood stains or paints or anything like
2 that?

3 A. No, sir.

4 Q. Okay. Did they use -- sorry.

5 Did they dispose of glues or epoxy at
6 the landfill?

7 A. Not to my knowledge, no, sir.

8 Q. Okay. Can you recall any other types of waste
9 from Atlas Steel Rule and Die?

10 A. There would be some grinding metals and some
11 shavings, steel shavings, and office paper.

12 Q. Okay. What size container did Atlas Steel Rule
13 and Die have?

14 A. I believe they had an 8-yard.

15 Q. How often would their container be emptied?

16 A. Maybe once a week.

17 Q. Are you aware of any company other than HIMCO
18 that picked up waste for Atlas Steel Rule and
19 Die?

20 A. No, sir.

21 Q. The next company is Auspro Manufacturing Company
22 at 1319 West Bristol Street.

23 Are you familiar with that company?

24 A. No, sir.

25 Q. I believe they're a musical instrument company.

1 Does that refresh your recollection at all?

2 A. No, sir.

3 Q. The next company is JJ Babbitt Company at 1505
4 West Beardsley Avenue.

5 Are you familiar with that company?

6 A. No, sir.

7 Q. The next company is Babcock & Wilcox Company,
8 Tubular Product Division, at 1019 Mishawaka
9 Street.

10 Are you familiar with that company?

11 A. Yes.

12 Q. What type of company was Babcock & Wilcox?

13 A. Well, they -- they were a metal-forming company
14 out of tubular steel.

15 Q. Did they have a foundry?

16 A. Yes, sir.

17 Q. Did Babcock & Wilcox dispose of its waste at the
18 County Road 10 Landfill?

19 A. Yes, sir.

20 Q. And did they dispose of foundry sand at the
21 landfill?

22 A. Yes, sir.

23 Q. And did you become familiar with the types of
24 waste they disposed of at the landfill?

25 A. Yes.

- 1 Q. And what other types of waste besides foundry
2 sand did they dispose of at the County Road 10
3 Landfill?
- 4 A. Steel tubing, their regular floor scrapings, and
5 wood and steel banding.
- 6 Q. Scrap metals?
- 7 A. Yes, sir.
- 8 Q. Okay. Cutting oils?
- 9 A. Yes, sir. But there again I'd like to clarify.
10 When I say cutting oils on some of these places,
11 I do not mean that they would throw buckets away
12 but they might throw the empty bucket that
13 contained the cutting oil or the metal itself
14 had cutting oil on it. There would be drippings
15 on it.
- 16 Q. Okay. So unless you say that they are disposing
17 of large volumes of cutting oils, what you're
18 saying is that there are cutting oils in their
19 wastes in various quantities?
- 20 A. That's correct.
- 21 Q. Okay. Still speaking about Babcock & Wilcox,
22 did they dispose of solvents or cleaning
23 solutions at the landfill?
- 24 A. Not to my knowledge. But I feel that they would
25 have had those products because of the greasy

1 conditions they worked in.

2 Q. And do you believe that they did then dispose of

3 wastes like that, solvents and cleaning --

4 A. Yes, sir.

5 Q. How about paints or primers, did they dispose of

6 those sorts of wastes at the landfill?

7 A. No, sir.

8 Q. And how about degreasers, did Babcock & Wilcox

9 dispose of degreasers at the landfill?

10 A. I would say yes, sir.

11 Q. Do you recall any other sorts of waste that

12 Babcock & Wilcox disposed of at the landfill?

13 A. No, sir.

14 Q. What type of container did Babcock & Wilcox

15 have?

16 A. I believe they had two 8-yards.

17 Q. How often would their containers be emptied?

18 A. There again, I would say maybe once or twice a

19 week.

20 Q. The next company I have is Vincent Bach

21 Corporation, 500 Industrial Parkway.

22 A. Yes, sir.

23 Q. Are you familiar with that company?

24 A. Yes, sir.

25 Q. What type of company is Vincent Bach?

1 A. Band instrument manufacturer.

2 Q. Did they dispose of their waste at the County
3 Road 10 Landfill?

4 A. Yes, sir.

5 Q. Were you familiar with the types of waste they
6 generated?

7 A. Yes, sir.

8 Q. And did you become familiar with the types of
9 waste they disposed of at the landfill?

10 A. Yes, sir.

11 Q. Did they dispose of soldering agents and fluxes?

12 A. Yes, sir.

13 Q. Did Bach dispose of buffing wheels?

14 A. Yes, sir.

15 Q. Did Bach dispose of scrap metals and brass?

16 A. Yes, sir.

17 Q. Did they also dispose of paints, primers, or
18 lacquers at the landfill?

19 A. Yes, sir.

20 Q. Did their waste contain cutting oils?

21 A. Yes, sir.

22 Q. Did Bach's waste also contain thinners or
23 solvents?

24 A. I would say yes, sir.

25 Q. Okay. Do you recall any other types of waste

1 that they disposed of?

2 A. Just your normal paper, cardboard, and skids,
3 used skids.

4 Q. You mentioned that they disposed of solvents.
5 Do you recall any specific solvent they used?

6 A. No, sir.

7 Q. Were there any other companies that were picking
8 up the waste at Vincent Bach during that time
9 period?

10 A. Not to my knowledge, sir.

11 Q. What size container did Bach Company have?

12 A. I believe they had a 16-yard also.

13 Q. How often --

14 A. There again, once or twice a week.

15 Q. The next company is Vernon M. Ball, Inc., at 515
16 E Street.

17 A. Yes, sir.

18 Q. Are you familiar with that company?

19 A. Yes, sir.

20 Q. What business is Vernon Ball?

21 A. It was an auto -- car dealership.

22 Q. Did they do automobile maintenance?

23 A. Yes, sir.

24 Q. Did Vernon Ball, Inc., dispose of its waste at
25 the County Road 10 Landfill?

1 A. Yes, sir.

2 Q. And did you become familiar with the types of
3 waste they disposed of at the landfill?

4 A. Yes, sir.

5 Q. And what types of waste do you recall Ball
6 disposing of at the landfill?

7 A. Well, like mufflers, tailpipes. If a car was in
8 an automobile accident, maybe an old fender or
9 two. Bumpers. Oil filters, air cleaners.

10 Q. Used batteries?

11 A. Possibility of used batteries, yes, sir.

12 Q. How about automobile fluids?

13 A. Yes, sir.

14 Q. Did Ball dispose of oils and oily rags at the
15 landfill?

16 A. Yes, sir.

17 Q. How about old tires?

18 A. Yes, sir.

19 Q. Okay. Do you recall any other sorts of waste
20 that Ball disposed of at the landfill?

21 A. No, sir.

22 Q. What size container did Ball have?

23 A. I believe also they had about an 8-yard
24 container.

25 Q. How frequently was their container emptied?

1 A. Probably on a once a week basis.

2 Q. Are you aware of any companies that were picking
3 up waste from Ball during this period?

4 A. No, sir.

5 Q. The next company is Barger Packaging at 1511
6 West Lusher.

7 Are you familiar with that company?

8 A. Yes, sir.

9 Q. What is their business?

10 A. Cardboard box packaging company or supplier.

11 Q. Did Barger Packaging dispose of their waste at
12 the County Road 10 Landfill?

13 A. Yes, sir.

14 Q. Did you become familiar with the types of waste
15 they disposed of there?

16 A. Yes, sir.

17 Q. What types of waste did they dispose of at the
18 County Road 10 Landfill?

19 A. Basically cardboard. And there again, skids and
20 banding.

21 Q. Did they dispose of oily rags and grease or
22 greasy rags at the landfill?

23 A. No, sir.

24 Q. Okay. Do you recall any other sorts of waste
25 they disposed of at the landfill?

1 A. No, sir.

2 Q. What size container did they have at Barger?

3 A. They had a 16.

4 Q. And how often was their container emptied?

5 A. About once a week.

6 Q. The next company is Battjes Pontiac.

7 Let's take a break.

8 (Whereupon a short recess was
9 taken.)

10 BY MR. OSLAN:

11 Q. We were just about to leave Barger Packaging.

12 Do you recall anything else about
13 Barger Packaging?

14 A. Well, yes. I've been in the factory before, and
15 it run in my mind that they did use different
16 colored inks in there where they would stamp a
17 box that they were making with a label on it if
18 they wanted it.

19 Q. So do you believe that they disposed of inks and
20 that type of waste at the landfill?

21 A. Yes, sir.

22 Q. Is there anything else about Barger that you
23 recall?

24 A. No, sir.

25 Q. Okay. The next company is Battjes Pontiac at --

1 A. Yes, sir.

2 Q. -- 2000 West Franklin.

3 Are you familiar with that company?

4 A. That was an automobile dealership.

5 Q. Did they do automobile maintenance?

6 A. Yes, sir.

7 Q. Okay. Did they dispose of their waste at the
8 County Road 10 Landfill?

9 A. Yes, sir.

10 Q. Did you become familiar with the types of waste
11 they disposed of at the landfill?

12 A. Yes, sir.

13 Q. Did they dispose of used oil, automobile
14 products?

15 A. Yes, sir.

16 Q. Did they dispose of used automobile fluids like
17 brake fluids and such?

18 A. I would say the empty containers, yes, sir.

19 Q. Do you recall that the containers had residues
20 in them of those fluids, though?

21 A. Yes, sir.

22 Q. Used batteries, did they dispose of used
23 batteries at the landfill?

24 A. I would say yes.

25 Q. Okay. Used tires?

1 A. Yes.

2 Q. Okay. Used solvents or industrial cleaners or
3 degreasers?

4 A. Probably in oily rags and sweeping compounds,
5 yes.

6 Q. And do you believe that all three of those,
7 solvents, cleaners, and degreasers, were
8 contained in their waste?

9 A. Yes, sir.

10 Q. Do you recall any other types of waste that
11 Battjes Pontiac disposed of at the landfill?

12 A. Not really, no, sir.

13 Q. Okay. Are you aware of any other companies that
14 picked up their waste during the time period
15 that you were taking their waste to the
16 landfill?

17 A. No, sir.

18 Q. What size container did they have?

19 A. I believe they had a 4-yard, sir.

20 Q. How often was their container emptied?

21 A. I believe they were on a call-in basis.

22 Q. Okay. Do you have an average frequency?

23 A. Usually at least once a week.

24 Q. The next company is Battler Manufacturing at
25 2120 West Franklin.

1 Are you familiar with that company?

2 A. Yes, sir.

3 Q. What business were they in?

4 A. They manufactured cushions for the mobile home
5 industry.

6 Q. Did Battler dispose of its waste at the
7 landfill?

8 A. Yes, sir.

9 Q. Did you become familiar with the types of waste
10 they disposed of at the landfill?

11 A. Yes, sir.

12 Q. Did they dispose of glues and epoxies at the
13 landfill?

14 A. Yes, sir.

15 Q. Did they dispose of scrap foam?

16 A. Yes, sir.

17 Q. Or used cushions, old cushions?

18 A. Yes, sir.

19 Q. Did they dispose of any oils or anything like
20 that?

21 A. No, sir.

22 Q. Do you recall any other types of waste that
23 Battler disposed of at the landfill?

24 A. Well, I would call it vinyl and scrap cloth that
25 they would make the cushions from and then the

1 spools that the thread come on that they would
2 sew these things together with.

3 Q. Okay. What size container did Battler have?

4 A. I believe they started off with a 4-yard, and
5 then I believe they eventually got to possibly a
6 16-yard.

7 Q. How frequently was their container emptied?

8 A. There again, I'd say on a once or twice a week
9 basis, depending on how the mobile home industry
10 was running at that time.

11 Q. Right. Okay. The next company is Beauty Tex
12 Corp. at 825 Logan.

13 Are you familiar with that company?

14 A. No, sir.

15 Q. The next company is Bethel Publishing Company at
16 1819 South Main Street.

17 Are you familiar with that company?

18 A. Yes, sir.

19 Q. And what business are they in?

20 A. They're just a small publishing company. I
21 believe they do a lot of religious publishing.

22 Q. Did Bethel Publishing dispose of their waste at
23 the landfill?

24 A. Yes, sir.

25 Q. And did you become familiar with the types of

1 waste they disposed of at the landfill?

2 A. Yes, sir.

3 Q. What types of waste do you recall?

4 A. Mostly paper and cardboard and possibly a skid
5 or two.

6 Q. Did they dispose of any wastes with inks?

7 A. Yes, sir, I believe they did.

8 Q. Do you recall any other waste that Bethel
9 Publishing disposed of at the landfill?

10 A. No, sir.

11 Q. What size container did they have?

12 A. I believe they had a 3-yard container.

13 Q. How often was their container emptied?

14 A. Probably on the average of once a week.

15 Q. The next company is Bi-Lo Station No. 1021 at
16 230 North Main Street.

17 Are you familiar with that company?

18 A. Yes, sir.

19 Q. What type of company is that?

20 A. It's just a service station for gasoline. You
21 can buy oil, window cleaner, whatever.

22 Q. Do they do automobile maintenance at Bi-Lo?

23 A. No, sir.

24 Q. Do they repair automobiles at that --

25 A. No, sir.

- 1 Q. Did Bi-Lo dispose of its waste at the landfill?
- 2 A. Yes.
- 3 Q. Did you become familiar with the types of waste
- 4 that Bi-Lo disposed of at the landfill?
- 5 A. Yes.
- 6 Q. What type of waste did they --
- 7 A. Mostly used motor oil cans and paper and just
- 8 what it took to run the filling station. It was
- 9 kind of a cut-rate station. You drove in and
- 10 bought gas, and if you wanted a quart of oil,
- 11 you poured it in yourself.
- 12 Q. Okay. Did they have a small container?
- 13 A. Yes, sir.
- 14 Q. What size was that?
- 15 A. I believe they had a 3-yard.
- 16 Q. Approximately how often was their container
- 17 emptied?
- 18 A. There again, I'd say once to twice a week.
- 19 Q. The next company is Bisig's Glass and Screen
- 20 Service at 1029 South Main Street.
- 21 Are you familiar with that company?
- 22 A. Yes, sir.
- 23 Q. What business were they in?
- 24 A. They -- as I recall, they just had a lot of
- 25 glass, and I believe they also furnished some

1 mirrors to the trailer industry, and they would
2 cut and replace glass and mirrors.

3 Q. Did Bisig's dispose of their waste at the
4 landfill?

5 A. Yes, sir.

6 Q. And did you become familiar with the types of
7 waste they disposed of at the landfill?

8 A. Yes, sir.

9 Q. What in particular do you recall about the types
10 of waste that Bisig's disposed of at the
11 landfill?

12 A. Mostly broken glass and trimmed-off pieces, a
13 little screen wire now and then and skids and
14 banding, cardboard.

15 Q. Do you recall anything else about their waste?

16 A. No, sir.

17 Q. What size container did Bisig's have?

18 A. I believe they had a 6-yard.

19 Q. How often was their container emptied?

20 A. There again, I'd say on a once or twice a week
21 basis.

22 Q. Okay. The next company is E. K. Blessing at
23 1301 West Beardsley.

24 Are you familiar with that company?

25 A. Yes, sir.

- 1 Q. And what business are they in?
- 2 A. They're a band manufacturer.
- 3 Q. They manufacture musical instruments?
- 4 A. Yes, sir.
- 5 Q. Okay. And did Blessing dispose of its waste at
- 6 the County Road 10 Landfill?
- 7 A. Yes, sir.
- 8 Q. Did you become familiar with the types of waste
- 9 they disposed of there?
- 10 A. Yes.
- 11 Q. And did that include soldering agents and
- 12 fluxes?
- 13 A. Yes, sir.
- 14 Q. Cleaning compounds?
- 15 A. Yes, sir.
- 16 Q. Used buffing wheels?
- 17 A. Yes, sir.
- 18 Q. How about scrap metals or scrap brass?
- 19 A. Not too much. There could be like a little
- 20 grinding from where they worked around the keys
- 21 on the horns and so on but not lots.
- 22 Q. Some but not a lot?
- 23 A. Yeah.
- 24 Q. How about paints and primers?
- 25 A. Maybe some lacquer.

1 Q. Lacquers?

2 A. (Witness nods head.)

3 Q. Did they dispose of paint thinners or solvents
4 at the landfill?

5 A. Not in any large quantity, no, sir.

6 Q. Did they use cutting oils and dispose of cutting
7 oil wastes at the landfill?

8 A. Yes, sir.

9 Q. Do you recall any other types of waste? Did
10 they also dispose of office-type waste?

11 A. That's correct.

12 Q. Papers?

13 A. That's correct, sir.

14 Q. Do you recall any others?

15 A. No, sir.

16 Q. What size container did E. K. Blessing have?

17 A. I believe they had a 16-yard, sir. And there
18 again, probably dumped once or twice a week.

19 Q. Are you aware of any companies that were picking
20 up waste from Blessing during the same period
21 that you were taking their waste to the
22 landfill?

23 A. No, sir.

24 Q. The next company is Boger, Martin & Fairchild at
25 30651 U.S. 20.

1 Are you familiar with that company?

2 A. No, sir.

3 Q. The next company is Bonded Products, Division of
4 DWS Sales, at 2623 Phillips Street.

5 Do you recall that company?

6 A. No, sir.

7 Q. Okay. The next company is Borden Elkhart 2227.
8 The address is Municipal Airport.

9 Are you familiar with that company?

10 A. No, sir.

11 Q. The next company is Borneman -- that's
12 B-o-r-n-e-m-a-n -- Industrial Supply at 124 East
13 High.

14 A. Yes, sir.

15 Q. Are you familiar with that company?

16 A. Yes, sir.

17 Q. What business are they in?

18 A. They supply a lot of the tools to the trailer
19 manufacturers such as drill bits and gloves.

20 Q. Are they a manufacturer?

21 A. No, sir.

22 Q. Did they dispose of their waste at the landfill?

23 A. Yes, sir.

24 Q. What types of waste did they dispose of there?

25 A. Mostly steel bandings, cardboard, skids.

- 1 Q. Any others?
- 2 A. Not that I recall.
- 3 Q. What size container did Borneman have?
- 4 A. I believe they had a 4-yard, sir.
- 5 Q. How often was that emptied?
- 6 A. I believe it was twice a week.
- 7 Q. The next company is Bower Manufacturing Co.,
8 Inc., at 2515 Industrial Park Drive in Goshen.
9 Are you familiar with that company?
- 10 A. No, sir.
- 11 Q. The next company is Brads-Ko Inc. at 1009 South
12 9th Street.
13 Are you familiar with that company?
- 14 A. They're a surveying outfit.
- 15 Q. Land surveyors?
- 16 A. Yes.
- 17 Q. And did they dispose of their waste at the
18 landfill?
- 19 A. Yes, sir.
- 20 Q. Did you become familiar with the types of waste
21 they disposed of at the landfill?
- 22 A. Yes, sir.
- 23 Q. What types of waste did they dispose of?
- 24 A. Just mainly office trash.
- 25 Q. What size container did they have?

1 A. I believe they had a 2-yard.

2 Q. How often was that emptied?

3 A. Probably on a once a week basis.

4 Q. Did the land surveying -- strike that.

5 Did the waste from Brads-Ko include
6 old blueprints?

7 A. Yes, sir.

8 Q. And did they have inks that they used and did
9 they dispose of cans that had ink in them?

10 A. I don't recall, sir.

11 Q. Okay. The next company is Brand Company at 1117
12 West Beardsley Street.

13 Do you recall that company?

14 A. No, sir.

15 Q. Okay. The next company is Broadway Elkhart at
16 640 Collins Road.

17 Are you familiar with that company?

18 A. Yes, sir.

19 Q. And what type of company was Broadway Elkhart?

20 A. They were an aluminum extruder.

21 Q. And what types of waste did they dispose of at
22 -- strike that.

23 Did they dispose of their waste at the
24 County Road 10 Landfill?

25 A. Yes, sir.

1 Q. And did you become familiar with the types of
2 waste they disposed of there?
3 A. Yes, sir.
4 Q. And did they dispose of scrap metals?
5 A. Yes, sir.
6 Q. And old pallets?
7 A. Yes, sir.
8 Q. Did they dispose of banding?
9 A. Yes, sir.
10 Q. Did they dispose of solvents?
11 A. Yes, sir.
12 Q. Okay. Did they dispose of cleaning solutions,
13 industrial cleaning solutions?
14 A. Yes, sir.
15 Q. How about cutting oils, did they use cutting
16 oils in their business?
17 A. Yes. To some extent, yes, sir.
18 Q. So do you believe that they disposed of some
19 cutting oils with their waste at the landfill?
20 A. Yes, sir.
21 Q. Okay. Did they also dispose of just general
22 office waste?
23 A. Yes, sir.
24 Q. Do you recall any other types of waste that
25 Broadway Elkhart disposed of --

- 1 A. No.
- 2 Q. -- at the landfill?
- 3 A. No, sir.
- 4 Q. Were there any other companies that were picking
5 up their waste when you were disposing of their
6 waste at the landfill?
- 7 A. Not to my knowledge, sir.
- 8 Q. What size container did they have at their place
9 of business?
- 10 A. I believe they had a 48-yard, sir.
- 11 Q. How often would their container be emptied?
- 12 A. Frequently if the trailer business was good.
- 13 Q. Was that --
- 14 A. Maybe three times a week.
- 15 Q. The next company is Burnstine's Distributing at
16 358 South Elkhart.
- 17 Are you familiar with that company?
- 18 A. Yes, sir.
- 19 Q. What do they do?
- 20 A. They were an RV distributor or mobile home
21 distributor of several different products.
- 22 Q. Okay. Did they do any manufacturing or --
- 23 A. Not to my knowledge.
- 24 Q. Did they dispose of their waste at the County
25 Road 10 Landfill?

- 1 A. Yes, sir.
- 2 Q. And did you become familiar with the types of
3 waste they disposed of there?
- 4 A. Yes, sir.
- 5 Q. And what types of waste would you dispose of at
6 the landfill from Burnstine's?
- 7 A. A lot of cardboard, bandings, skids, and on
8 occasion like roof-coating cans that were
9 damaged or --
- 10 Q. How about any glues or epoxy, anything like
11 that?
- 12 A. Not that I can recall. I recall more of the
13 roof coat type material.
- 14 Q. Okay.
- 15 A. And the putties for around windows and trailers
16 and so on.
- 17 Q. Caulking?
- 18 A. Caulking.
- 19 Q. What do you mean by roof coating? Is that like
20 a sealer?
- 21 A. Yeah. On the top of the mobile homes they get
22 up there and they -- you open the pail up and it
23 looks black, and you stir it up and it turns
24 silver, and you applied it on the roofs of these
25 mobile homes back in those days.

- 1 Q. Okay. Do you recall any other types of waste
2 that Burnstine's disposed of at the landfill?
- 3 A. No, sir.
- 4 Q. What size container did they have?
- 5 A. I believe they had a 16-yard and then they
6 eventually went to a 42-yard.
- 7 Q. How often would their container be emptied?
- 8 A. There again, depending on what the trailer
9 industry was doing, probably once to twice a
10 week.
- 11 Q. The next company is By Pass Paint Shop at --
- 12 A. Yes.
- 13 Q. -- 1132 North Nappanee Street.
- 14 Are you familiar with that company?
- 15 A. Yes, sir.
- 16 Q. What did they do?
- 17 A. It was a paint shop for anything that wanted to
18 be painted, from mobile homes to cars to --
- 19 Q. Okay. Did By Pass Paint Shop dispose of its
20 waste at the landfill?
- 21 A. Yes, sir.
- 22 Q. And did you become familiar with the types of
23 waste they disposed of at the landfill?
- 24 A. Yes, sir.
- 25 Q. And what types of waste did they dispose of at

1 the landfill?

2 A. Lots of empty paint cans. They would mask off
3 these trailers and the overspray that went onto
4 the masking paper. In fact, they would even
5 mask the floor. And after it got so bad, they'd
6 roll the paper up and throw it away.

7 Q. So the paint cans and the masking that you
8 disposed of at the landfill had paint residues
9 on it?

10 A. Yes, sir.

11 Q. Did they use any paint thinners?

12 A. Yes, sir.

13 Q. And did you dispose of cans with paint thinner
14 still in them?

15 A. (Witness nods head.)

16 Q. Did they use any cleaning agents such as
17 solvents or degreasers, anything like that?

18 A. Yes, sir.

19 Q. And did they dispose of solvents and degreasers
20 at the landfill?

21 A. Yes, sir.

22 Q. Okay. Did you also dispose of their general
23 office waste?

24 A. Yes, sir.

25 Q. What size container did they have at By Pass

1 Paint Shop?

2 A. I believe they had a 16-yard.

3 Q. And how often was that container emptied?

4 A. I believe the By Pass Paint Shop was on a

5 call-in basis.

6 Q. Was there an average frequency?

7 A. I'd say once a week.

8 Q. The next company is By-Pass Shell at 415 North

9 Nappanee.

10 A. Yes, sir.

11 Q. And what kind of company was that?

12 A. That was a full-service filling station.

13 Q. Okay. So they did automobile maintenance and

14 automobile repair there?

15 A. Yes, sir.

16 Q. Did By-Pass Shell dispose of its waste at County

17 Road 10 Landfill?

18 A. Yes, sir.

19 Q. And do you know the types of waste they disposed

20 of there?

21 A. Yes, sir.

22 Q. Okay. Did they dispose of old or used

23 automobile fluids, brake fluids and transmission

24 fluid, that kind of thing?

25 A. No, sir.

1 Q. How about old batteries?

2 A. Possibility, yes, sir.

3 Q. Do you believe they did?

4 A. Yes, sir.

5 Q. How about oily rags?

6 A. Yes, sir.

7 Q. Used tires?

8 A. Yes, sir.

9 Q. Did they dispose of old engine parts with oil on

10 them or fluids on them?

11 A. Yes, sir.

12 Q. Okay. Do you recall any other types of waste

13 that By-Pass Shell disposed of at the site?

14 A. Not really, no, sir.

15 Q. Are you aware of any other companies that were

16 picking up their waste during that time period?

17 A. No, sir.

18 Q. What size container did By-Pass Shell have?

19 A. I think they had a 4-yard.

20 Q. And how frequently was their 4-yard emptied and

21 their waste taken to the landfill?

22 A. I would say there again, once or twice a week.

23 Q. The next company is CG Conn Limited at 1101 East

24 Beardsley Avenue.

25 Are you familiar with that company?

1 A. Yes, sir.

2 Q. And what type of business with they in?

3 A. They were a band manufacturer.

4 Q. They were a manufacturer of musical instruments?

5 A. Yes, sir.

6 Q. Okay. We've talked about a few of them thus
7 far.

8 Did CG Conn dispose of their waste at
9 the County Road 10 Landfill?

10 A. Yes, sir.

11 Q. And did you become familiar with the types of
12 waste they disposed of there?

13 A. Yes, sir.

14 Q. And did they dispose of soldering agents and
15 fluxes?

16 A. Yes, sir.

17 Q. Did they dispose of used buffing wheels?

18 A. Yes, sir.

19 Q. Did they dispose of scrap metals?

20 A. A little.

21 Q. Shavings?

22 A. Yes.

23 Q. Okay. How about lacquers?

24 A. Yes.

25 Q. And how about solvents?

1 A. Yes.

2 Q. Any paint thinners at all?

3 A. More than likely, yes.

4 Q. Do you believe that they did use -- or strike
5 that.

6 Do you believe that they did dispose
7 of paint thinners at the landfill?

8 A. Right.

9 Q. Did they use cutting oils also?

10 A. Yes.

11 Q. And they disposed of cutting oils with their
12 waste at the landfill?

13 A. Yes.

14 Q. Do you recall any other types of waste that Conn
15 disposed of at the landfill?

16 A. No.

17 Q. I assume that their general office --

18 A. Right, right.

19 Q. -- waste?

20 A. Skids and cardboard.

21 Q. Banding?

22 A. Boxes that stuff come in, was shipped in, yes.

23 Q. What size container did Conn have?

24 A. I believe they had a 16-yard too. And I believe
25 they were dumped probably on a once or twice a

1 week basis.

2 Q. The next company is C. O. Tools, Inc., and the
3 address I have is P. O. Box 1485.

4 Are you familiar with that company?

5 A. No, sir.

6 Q. The next company is C.T.S. of Elkhart at 900
7 North West Boulevard.

8 Are you familiar with that company?

9 A. Yes, sir.

10 Q. What type of company was C.T.S.?

11 A. They were a manufacturer of a little bit of
12 everything. Switches, car parts.

13 Q. Okay. Did C.T.S. dispose of its waste at the
14 County Road 10 Landfill?

15 A. Yes, sir.

16 Q. And did you become familiar with the types of
17 waste that C.T.S. shipped to the landfill?

18 A. Yes, sir.

19 Q. What types of waste did C.T.S. dispose of at the
20 landfill?

21 A. Lots of little plastic circuit boards.

22 Q. Okay. Did they dispose of industrial cleaners,
23 oils?

24 A. Yes, sir.

25 Q. Did they use degreasers?

- 1 A. Yes, sir.
- 2 Q. So do you believe they disposed of degreasing
3 agents at the landfill?
- 4 A. Yes, sir. Steel shavings with cutting oil.
- 5 Q. Did they dispose of cans with residues of oils
6 and --
- 7 A. Yes, sir.
- 8 Q. -- degreasing agents and so on?
- 9 A. Yes, sir.
- 10 Q. Did they use adhesives?
- 11 A. Yes, sir.
- 12 Q. Did they dispose of cans that had adhesives in
13 them?
- 14 A. Probably residue, yes.
- 15 Q. Did they do any painting at C.T.S.? Did they
16 dispose of paint cans or paint thinners,
17 anything like that?
- 18 A. Just on their regular maintenance of the
19 factory, yes. I would say yes.
- 20 Q. And did they also dispose of their general
21 office waste there?
- 22 A. Yes, sir.
- 23 Q. Were there any other companies that were picking
24 up their waste at the time?
- 25 A. Not to my knowledge, no, sir.

1 Q. What size container did C.T.S. have?

2 A. They had a 16-yard, and then I believe they also
3 went to the roll-off containers later on.

4 Q. Okay. How large of a roll-off did they have
5 later on?

6 A. I believe a 42-yard.

7 Q. How often was their waste taken to the site?

8 A. This I cannot say. Depending on business, up to
9 two, three times a week.

10 Q. The next company is Carlton Manufacturing at
11 55786 Bullard Road.

12 Are you familiar with that company?

13 A. Yes, sir.

14 Q. What is that business?

15 A. They were a wood molding manufacturer.

16 Q. And did Carlton dispose of their waste at the
17 landfill?

18 A. Yes, sir.

19 Q. And did you become familiar with the types of
20 waste they sent there?

21 A. Yes, sir.

22 Q. What types of waste did they send?

23 A. Mostly cut off from molding and --

24 Q. Is that wood or --

25 A. Wood, wood. And sawdust and paper, cardboard.

1 Q. Did they use --

2 A. Skids.

3 Q. Did they dispose of glues or epoxies?

4 A. Not to my knowledge, no, sir.

5 Q. How about oily rags?

6 A. No, sir.

7 Q. Do you recall any other types of waste that
8 Carlton sent to the landfill?

9 A. No, sir.

10 Q. What size container did they have?

11 A. I believe they had a 16-yard.

12 Q. How frequently was that emptied?

13 A. I'd say an average of once a week.

14 Q. The next company is Cauffman Products, Inc.,
15 26683 Windsor.

16 Are you familiar with that company?

17 A. No, sir.

18 Q. The next company is Centaur Mobile Home Supply
19 Division, 1505 Leininger Avenue.

20 Do you know that business?

21 A. No, sir.

22 Q. Okay. The next company is Champion Motor Homes,
23 58277 State Road 19.

24 A. Right.

25 Q. Is that a mobile home manufacturing company?

- 1 A. Yes, sir.
- 2 Q. And did Champion dispose of its waste at the
3 landfill?
- 4 A. Yes, sir.
- 5 Q. And did you become familiar with their waste?
- 6 A. Yes, sir.
- 7 Q. And did their waste include soldering agents and
8 fluxes?
- 9 A. Not to my knowledge, no, sir.
- 10 Q. Did it include scrap metals?
- 11 A. Yes, sir.
- 12 Q. Did they dispose of glues and epoxies?
- 13 A. Yes, sir.
- 14 Q. Did they dispose of paints and primers and
15 lacquers at the landfill?
- 16 A. Yes, sir.
- 17 Q. Did they dispose of solvents at the landfill?
- 18 A. Yes, sir.
- 19 Q. Did they dispose of oils and greases at the
20 landfill?
- 21 A. Yes, sir.
- 22 Q. How about -- I note with some of these mobile
23 homes they have refrigerators. Did they dispose
24 of any refrigerants at the landfill?
- 25 A. No, sir.

- 1 Q. How about general office --
- 2 A. Yes, sir.
- 3 Q. Okay. Do you recall any other types of waste
- 4 that Champion sent to the landfill?
- 5 A. Yes, sir. I would say empty roof coat 5-gallon
- 6 pails and caulking from around the windows.
- 7 Q. Okay. What size container did Champion have?
- 8 A. I believe they had a 48-yard, sir.
- 9 Q. And how often was that emptied?
- 10 A. I would say up to three times a week.
- 11 Q. And were there any other companies that were
- 12 picking up Champion's waste during that period
- 13 that you were disposing of their waste at the
- 14 landfill?
- 15 A. Not to my knowledge, sir.
- 16 Q. The next company is Checker Oil Company at 35124
- 17 South Main.
- 18 A. Yes, sir.
- 19 Q. Is that a gas station?
- 20 A. Yes, sir.
- 21 Q. Do they do automobile repair and maintenance
- 22 there?
- 23 A. Yes, sir.
- 24 Q. Okay. What type of --
- 25 A. I don't believe they did so much repair as they

1 did grease jobs and oil changes on an outside
2 lube rack.

3 Q. Did Checker Oil dispose of its waste at the
4 landfill?

5 A. Yes, sir.

6 Q. Do you know the types of waste it disposed of?

7 A. The common things for a filling station, a few
8 old tires, possibly a battery, used motor oil
9 cans.

10 Q. Automobile fluids such as brake fluids and that
11 kind of thing?

12 A. I would say brake fluid cans with probably a
13 little residue left in them, yes, sir.

14 Q. What size container did Checker have?

15 A. I believe they had a 3-yard.

16 Q. And how frequently was that emptied?

17 A. I believe that was dumped twice a week.

18 Q. The next company is City Roofing, 2300
19 Sterling.

20 I have a sense of what their business
21 is, but what were they actually doing?

22 A. That's what they were doing. They were a
23 reroof.

24 Q. And did they dispose of their waste at the
25 landfill?

- 1 A. Yes, sir.
- 2 Q. And did you become familiar with the types of
3 waste they shipped there?
- 4 A. Yes, sir.
- 5 Q. And did it include old shingles?
- 6 A. Yes, sir.
- 7 Q. Did they use any tar or sealers?
- 8 A. Yes, sir.
- 9 Q. Did they dispose of buckets with tar in them?
- 10 A. Yes, sir.
- 11 Q. And did they dispose of containers for sealers,
12 sealants?
- 13 A. Yes, sir.
- 14 Q. What other types of waste did City Roofing
15 dispose of at the landfill?
- 16 A. Well, I call it the built-up roofing that --
17 where they put it on hot and then add stones to
18 it. And I'm sure they had the rolled
19 underlayment that you lay down there before you
20 put shingles down. Wood, probably a little
21 metal from weatherstripping, gutters.
- 22 Q. Okay. Did they dispose of any oils at the
23 landfill, or did their waste have oils on it?
- 24 A. Not that I can recall, no, sir.
- 25 Q. What size container did City Roofing have?

1 A. Well, City Roofing, they -- they could have had
2 anything from a 4-yard up to a 28-yard. It
3 depends on what size job they had to do.

4 Q. Okay. The next one I have is City Service Oil
5 Company, P. O. Box 267, Osceola.

6 Do you recall that company?

7 A. No, sir.

8 Q. The next company is Clark Service Station at
9 2811 Cassopolis Street.

10 A. Yes, sir.

11 Q. Is that a gas station?

12 A. Yes, sir.

13 Q. Do they do automobile maintenance or repair
14 there?

15 A. No, sir.

16 Q. Okay. Did Clark Service Station dispose of
17 their waste at the landfill?

18 A. Yes, sir.

19 Q. And do you know the types of waste that they
20 sent there?

21 A. Well, I would say it would be your average empty
22 oil cans or transmission fluid cans and
23 windshield washer solvent cans.

24 Q. Did they send old or used batteries to the
25 landfill?

- 1 A. I would say no.
- 2 Q. Okay. Do you recall any other types of waste
3 that Clark sent to the landfill?
- 4 A. Not off -- no, sir.
- 5 Q. Okay. What size container did Clark Service
6 Station have?
- 7 A. I believe they had a 3-yard.
- 8 Q. How often was that emptied?
- 9 A. Probably once a week.
- 10 Q. The next company is Conrail Corp.
- 11 Are you familiar with that company?
- 12 A. Yes, sir.
- 13 Q. And what business are they in?
- 14 A. That was out at the railroad yard.
- 15 Q. Okay. And did Conrail dispose of its waste at
16 the site?
- 17 A. Yes, sir.
- 18 Q. And did you become familiar with the types of
19 materials they sent there?
- 20 A. Yes, sir.
- 21 Q. And what types of waste did Conrail send to the
22 landfill?
- 23 A. From what I recall, mostly just paper and maybe
24 some food scraps because they had a cafeteria
25 type thing back in along the railroad.

1 Q. Okay. Did they do any maintenance work out
2 there on railroad cars?

3 A. Yes, sir.

4 Q. Okay. So did they generate the types of waste
5 that you would expect in like an automobile
6 maintenance or --

7 A. Yes, sir.

8 Q. -- that sort of business?

9 Okay. What types of waste did they
10 ship from the automobile maintenance or train
11 car maintenance aspect of the business?

12 A. Well, I would say your average, like grease
13 tubes, empty cartridges, maybe 5-gallon pails of
14 grease and oils and oily rags and sweeping
15 compound.

16 Q. Did they send any railroad ties out there?

17 A. Well, I'm sure there was a few that -- not
18 necessarily a full railroad tie but broken-up
19 pieces, end pieces that came in to the landfill,
20 yes.

21 Q. Okay. Do you recall any other waste that
22 Conrail shipped to the landfill?

23 A. No, sir.

24 Q. What size container did they have?

25 A. I believe they had some front-end loader

1 containers and I believe they had a 16- or
2 22-yard loader.

3 Q. And how frequently would their containers be
4 emptied?

5 A. I think they were on twice a week pickup.

6 Q. The next company is Consolidated Metal Products
7 on Highland Boulevard.

8 Are you familiar with that company?

9 A. No, sir.

10 Q. Okay. The next company I have is Continental
11 Can on Division Street.

12 Are you familiar with that company?

13 A. Yes, sir.

14 Q. What business were they in?

15 A. They were in -- they manufactured boxes. I
16 don't know what all they manufactured for sure,
17 but they were a pretty good-sized account at one
18 time. A lot of cardboard came out of it.

19 Q. Did they dispose of their waste at the landfill?

20 A. Yes, sir.

21 Q. And aside from cardboard, what other types of
22 substances did they send to the site? What
23 other types of waste did they send to the site?

24 A. Lots of banding, lots of skids.

25 Q. How about oily rags?

- 1 A. Yes.
- 2 Q. Grease?
- 3 A. Yes, some.
- 4 Q. Did they send cans with oil residues and grease
5 residues?
- 6 A. Yes, to some extent.
- 7 Q. Okay. Do you recall any other waste from
8 Continental Can to the landfill?
- 9 A. No, sir.
- 10 Q. Okay. What size container did they have,
11 Continental Can?
- 12 A. I believe they had a 42-yard.
- 13 Q. How frequently was that emptied?
- 14 A. I think they were on a call-in basis of maybe
15 once or twice a week. It just depends on how
16 good business was.
- 17 Q. The next one I have is Alonzo Craft at 1135 Kent
18 Street.
- 19 Do you know that person or that
20 business?
- 21 A. No.
- 22 Q. The next company is Creative Engineering, Inc.,
23 at 1401 Concord Avenue.
- 24 A. No.
- 25 Q. Are you familiar with that company?

- 1 A. No.
- 2 Q. How about Crest Flooring Distribution or
3 Distributors, Inc., at 1611 McDonald Street?
- 4 A. No.
- 5 Q. The next one is Crosbie Foundry at 1600
6 Mishawaka Street.
- 7 A. Yes.
- 8 Q. I assume that's a foundry?
- 9 A. Yes.
- 10 Q. Did they dispose of their waste at the landfill?
- 11 A. Yes, sir.
- 12 Q. And do you know the types of waste that they
13 disposed of at the landfill?
- 14 A. It was just a small little foundry, and they had
15 the normal foundry sand.
- 16 Q. Did they dispose of old ingots at the landfill?
- 17 A. Yes, I would say there was a few of the old
18 ingots that went into the landfill.
- 19 Q. Okay. How about any oils, oily rags, cans with
20 oils in them?
- 21 A. Not that I can recall, but I'm sure there must
22 have been some.
- 23 Q. Okay. Did they use any solvents or anything
24 like that that you can recall in their
25 operations?

1 A. No, sir.

2 Q. Do you recall any other sorts of waste that
3 Crosbie sent to the County Road 10 Landfill?

4 A. Nothing other than probably some old skids and,
5 there again, probably some banding and regular
6 office paper.

7 Q. Were there any other companies that were picking
8 up waste from Crosbie during the time period
9 that you were taking their waste to the
10 landfill?

11 A. No, sir, not to my knowledge.

12 Q. What size container did Crosbie have?

13 A. I believe they had an 8-yard.

14 Q. And how frequently was that emptied?

15 A. Maybe once a week.

16 MR. OSLAN: I think we should take a
17 coffee break.

18 (Whereupon a short recess was
19 taken.)

20 BY MR. OSLAN:

21 Q. Okay. The next company I have on the list is
22 Crystal Lake Disposal, 176th and Briar Wood
23 Drive in Crystal Lake, Illinois.

24 Do you know that company?

25 A. No, sir.

1 Q. The next company I have is Culligan Water
2 Condition, 3233 South Main.

3 Do you know that company?

4 A. Yes, sir.

5 Q. What type of business are they in?

6 A. They're a water-softener company.

7 Q. Did they dispose of their waste at the landfill?

8 A. Yes, sir.

9 Q. And do you know the types of waste that they
10 disposed of at the landfill?

11 A. Yes, sir.

12 Q. What types of waste?

13 A. Just -- not too much. The regular office
14 paper. They might have a skid or two, some
15 cardboard, and maybe a broken bag of salt or two
16 once in a while.

17 Q. Did they send any old water softeners to the
18 landfill?

19 A. Yes, I think they have in the past.

20 Q. Okay. And do you recall any other types of
21 waste they sent there?

22 A. Not really, no, sir.

23 Q. What size container did Culligan have?

24 A. I believe they had a 4-yard.

25 Q. How frequently was that emptied?

1 A. Probably on about a once a week basis.

2 Q. The next company is Custom Fabricators, Inc.,
3 919 Baldwin.

4 Do you know them?

5 A. No, sir.

6 Q. The next company I have is Custom Vinyl, 2150
7 Lusher.

8 Are you familiar with that company?

9 A. Yes, sir.

10 Q. What type of business are they in?

11 A. They were -- they were a cushion manufacturer.
12 I'm not so sure that they manufactured the
13 cushions so much as cutting the vinyl for the
14 cushions.

15 Lots of cloth and vinyl.

16 Q. Okay. Did Custom Vinyl dispose of its waste at
17 the landfill?

18 A. Yes, sir.

19 Q. And are you familiar with the types of waste
20 they disposed of there?

21 A. Yes, sir.

22 Q. What did their waste include?

23 A. I believe they used some glues where they bonded
24 some of this vinyl together with -- which also
25 they sold a lot of it.

- 1 Q. Did they dispose of empty drums or pails with
2 glue residues in them?
- 3 A. Glue, yes, sir.
- 4 Q. Did they use any other types of fixation or
5 fixing compounds like epoxies?
- 6 A. Not to my knowledge, no, sir.
- 7 Q. Do you recall any other types of waste that
8 Custom Vinyl sent to the landfill?
- 9 Vinyl, I suppose, scraps of vinyl?
- 10 A. Uh-huh.
- 11 Q. Anything else?
- 12 A. Cardboard, banding, skids.
- 13 Q. Okay. What types of -- I'm sorry.
14 What size container did they have?
- 15 A. A 16-yard.
- 16 Q. And how often was their container emptied?
- 17 A. I'd say on the average of about once a week.
- 18 Q. The next company is D & W Sales, Inc., at 941
19 Oak Street.
- 20 What type of company is that or was
21 that?
- 22 A. They were a mirror manufacturer.
- 23 Q. Did they dispose of their waste at the landfill?
- 24 A. Yes, sir.
- 25 Q. Are you familiar with the types of waste that

1 they disposed of there?

2 A. Mostly broken-up pieces of glass, mirror, and
3 crates and bandings and plywood where they kept
4 it separated.

5 Q. Oily rags?

6 A. I don't recall that, no, sir.

7 Q. Okay. Do you recall any other types of waste
8 that D & W Sales, Inc., sent to the landfill?

9 A. Nothing other than your regular, average office
10 paper, memo notes and --

11 Q. Okay. What size container did they have?

12 A. I believe they had the small 8-yard.

13 Q. And how frequently was that emptied?

14 A. I believe they were on a call-in basis. Maybe
15 once every two weeks.

16 Q. The next company is Day Equipment at 1402 East
17 Monroe in Goshen.

18 A. Yes, sir.

19 Q. Are you familiar with that company?

20 A. Yes, sir.

21 Q. What business were they in?

22 A. They rebuilt hydraulic cylinders.

23 Q. Did they dispose of their waste at the landfill
24 at County Road 10?

25 A. No, sir, I don't think so.

1 Q. Do you know whether they disposed of their waste
2 someplace else or was it --

3 A. I don't think at County Road 10 -- I don't think
4 they were in business then.

5 Q. You think that Day Equipment went into business
6 after County Road 10 closed?

7 A. Yes, sir.

8 Q. The next company is Delta Formed Plastic at
9 53028 Ada Drive.

10 Are you familiar with that company?

11 A. Yes, sir.

12 Q. What kind of business were they in?

13 A. Plastic molding and extrusion.

14 Q. Did Delta Formed Plastic dispose of its waste at
15 the landfill?

16 A. Yes, sir.

17 Q. And are you familiar with the types of waste
18 that they disposed of at the landfill?

19 A. Yes, sir.

20 Q. Did that include scraps of plastic?

21 A. Yes, sir.

22 Q. How about glues or epoxies?

23 A. I would say yes, sir.

24 Q. Okay. Did they use any solvents, dispose of
25 solvent cans and rags with solvents?

- 1 A. I would say yes, sir.
- 2 Q. Okay. How about paints or pigments?
- 3 A. Yes, sir.
- 4 Q. Did they dispose of those at the landfill?
- 5 A. Yes, sir.
- 6 Q. Machine oil, machining oils?
- 7 A. Possibly some in their floor-sweeping compound.
- 8 I would say yes, sir.
- 9 Q. How about degreasers, did they dispose of
- 10 degreasers at the landfill?
- 11 A. Not to my knowledge, no, sir.
- 12 Q. And do you recall any other types of waste that
- 13 Delta Formed Plastic disposed of at the County
- 14 Road 10 Landfill?
- 15 A. Nothing other than cardboard and skids and metal
- 16 or plastic bandings.
- 17 Q. Okay. What size container did Delta have?
- 18 A. I believe they had the 16-yard, and then I think
- 19 also they went -- as time went along, they went
- 20 to a bigger 48-yard, 42 or 48.
- 21 Q. How often was their container emptied?
- 22 A. I'd say on the average of twice a week.
- 23 Q. The next company is Devan Corp.
- 24 A. Uh-huh.
- 25 Q. 26466 Oakwood Avenue.

1 Do you know that company?

2 A. Uh-huh.

3 Q. What do they do?

4 A. They're a van conversion.

5 Q. Did Devan Corp. dispose of their waste at the
6 County Road 10 Landfill?

7 A. Yes, sir.

8 Q. And are you familiar with the types of waste
9 they disposed of at the landfill?

10 A. Yes, sir.

11 Q. And did that include scraps of steel and
12 aluminum?

13 A. Yes, sir.

14 Q. How about glue wastes or epoxy wastes or glue
15 bottles?

16 A. Yes, sir.

17 Q. Did they use -- strike that.

18 Did they dispose of paint wastes,
19 lacquer wastes?

20 A. Yes, sir.

21 Q. How about thinner wastes, paint thinner wastes?

22 A. I would say yes, sir.

23 Q. How about industrial cleaners, degreasers?

24 A. Yes, sir.

25 Q. Did Devan Corp. dispose of oils and greases at

1 the landfill?

2 A. No, sir, not to my recollection.

3 Q. Okay. What other types of waste do you recall
4 Devan Corp. disposing of at the landfill?

5 A. I believe we've pretty well covered it, other
6 than the normal skids that a lot of their
7 products are shipped in on.

8 Q. What size container did Devan have?

9 A. I believe they had a 42-yard container.

10 Q. How frequently was their container emptied?

11 A. There again, it would depend on the business,
12 but I would say on average a couple times a
13 week.

14 Q. Are you aware of any other companies that were
15 picking up their waste during the period of time
16 that you were disposing of their waste at the
17 landfill?

18 A. No, sir.

19 Q. The next company I have is Diamond Shamrock
20 Chemical Co. at 613 South 4th Street.

21 Are you familiar with that company?

22 A. No, sir.

23 Q. I believe they operate -- in some areas at least
24 they operate service stations.

25 Was there a service station at that

1 location that you recall?

2 A. I -- I don't recall it, sir.

3 Q. Okay. The next company I have is Eugene
4 Dietzgen Company, 2500 South 17th Street.

5 Do you know that company?

6 A. Yes.

7 Q. What business were they in?

8 A. They made drafting paper. And I don't know,
9 they had some plastic paper that -- what would
10 you call it? You could lay it over -- like you
11 could lay a piece of plastic right over there
12 and still read through it and put lines on it.

13 Q. So they manufactured plastics?

14 A. Drafting-type paper and -- mylar, I think is
15 what you call it.

16 Q. Okay. Did Dietzgen dispose of their waste at
17 the landfill?

18 A. Yes, sir.

19 Q. And do you know the types of waste they disposed
20 of there?

21 A. Yes, sir.

22 Q. And since they're in the printing business, I
23 assume they disposed of inks; is that correct?

24 A. Yes. I'd say yes.

25 Q. And did they also dispose of blueprints?

1 A. Yes.

2 Q. And this plastic material that you're talking
3 about?

4 A. Yes.

5 Q. What other types of waste did Dietzgen dispose
6 of at the landfill?

7 A. Well, there again, their normal skids for
8 shipping their rolls of paper in and their
9 banding and regular office supply paper.

10 Q. What size container did they have?

11 A. I believe they had a 42-yard container. I
12 believe they had a 30 to start with and then
13 they went to a little larger one.

14 Q. How frequently was their container emptied?

15 A. At least once a week.

16 Q. Are you aware of any companies that were picking
17 up their waste at the time that you were
18 disposing of their waste at the landfill?

19 A. No, sir.

20 Q. The next company I have is Domore System
21 Division, 28652 Phillips.

22 Do you know that company?

23 A. No, sir.

24 Q. The next is Don's Printing, 1621 West Beardsley.

25 Do you know that company?

- 1 A. Yes, sir.
- 2 Q. What do they do?
- 3 A. It was just a little printing shop right around
4 the corner.
- 5 Q. Would they print up -- what type --
- 6 A. I -- I think they'll do anything you want if you
7 walk in there and want cards printed up or
8 stationery or whatever.
- 9 Q. Okay. Did Don's Printing dispose of their waste
10 at the landfill?
- 11 A. Yes, sir.
- 12 Q. And what type of waste did they dispose of
13 there?
- 14 A. Not too much. Merely just maybe if they made a
15 mistake or bad paper, a little cardboard.
- 16 Q. How about cans with ink residues in them?
- 17 A. Yes, I think there were a few.
- 18 Q. Okay. What size container did Don's have?
- 19 A. I believe they just had a 2-yard. Probably once
20 a week delivery or pickup.
- 21 Q. Okay. The next company I have is Dorfile
22 Manufacturing at 1627 West Lusher.
- 23 Do you know them?
- 24 A. No.
- 25 Q. The next company is Draggoo Electric Company,

1 1631 Oakland Avenue.

2 Are you familiar with Draggoo?

3 A. Yes, sir.

4 Q. What business were they in?

5 A. They're an electrical contractor.

6 Q. And did they dispose of their waste at the
7 landfill?

8 A. Yes, sir.

9 Q. And are you aware of any other companies that
10 picked up their waste at that time?

11 A. No, sir.

12 Q. What types of waste did the electric company
13 dispose of at the landfill?

14 A. Just your normal -- probably a little electrical
15 wire, probably some conduit, probably some
16 skids.

17 Q. Do you recall them disposing of any old motors?

18 A. Yes. I would say Draggoo -- yes.

19 Q. Okay. Did they have oily rags and --

20 A. Yes.

21 Q. Did they dispose of cans that had oil residues
22 in them or degreasers?

23 A. I would say yes.

24 Q. Do you recall any other types of material that
25 Draggoo Electric Company disposed of at the

1 landfill?

2 A. No, sir.

3 Q. What size container did Draggo have?

4 A. I think they had a 4-yard.

5 Q. And how often was their container emptied?

6 A. Probably on a once a week basis. They may have
7 been on call-in, too.

8 Q. Okay. The next company I have is Durakool,
9 Inc., at 1010 North Main Street.

10 What business were they in?

11 A. They manufactured electrical switches.

12 Q. And did Durakool dispose of its waste at the
13 County Road 10 Landfill?

14 A. Yes, sir.

15 Q. And did you become familiar with the types of
16 waste they disposed of there?

17 A. Yes, sir.

18 Q. And what types of waste did that include?

19 A. Well, I believe they had the little pressed-out
20 plastic -- what would you call them? -- boards.

21 Q. Switch boards?

22 A. Switch boards. And a little wire.

23 Q. Did they dispose of oil or grease or anything
24 like that?

25 A. Not that I recall, no, sir.

1 Q. Okay. How about degreasers?

2 A. No, sir.

3 Q. Do you recall any other types of waste that
4 Durakool sent to the landfill?

5 A. Not really, no, sir.

6 Q. What size container did Durakool have?

7 A. I believe they had an 8.

8 Q. How frequently was their 8-yard container
9 emptied and their waste taken to the landfill?

10 A. I'd say on a once a week basis.

11 Q. Okay. Let's finish the Ds and then we'll break
12 for lunch.

13 A. One more.

14 Q. The next company is Dygert's Trim & Glass at 515
15 East Jackson Boulevard.

16 Are you familiar with that company?

17 A. Yes, sir.

18 Q. And what business were they in?

19 A. They would put convertible tops on, put new
20 windshield glass, boat covers, whatever.

21 Q. And did Dygert's dispose of its waste at the
22 landfill?

23 A. Yes, sir.

24 Q. Did you become familiar with the types of waste
25 that they would dispose of there?

- 1 A. Yes, sir.
- 2 Q. What types of waste did that include?
- 3 A. Broken glass, old canvas from car tops, boat
4 covers, seat cushions.
- 5 Q. Did they dispose of glue bottles?
- 6 A. Yes, sir.
- 7 Q. And did they use sealers?
- 8 A. Yes, sir.
- 9 Q. So did they dispose of cans with sealers in
10 them?
- 11 A. I would say yes, sir.
- 12 Q. Did they do any painting?
- 13 A. Yes, sir.
- 14 Q. Did they dispose of cans with paint residues in
15 them?
- 16 A. Yes, sir.
- 17 Q. Do you recall any other types of waste that
18 Dygert's Trim & Glass sent to the landfill?
- 19 A. No, sir.
- 20 Q. What size container did they have?
- 21 A. I believe they had a 4-yard.
- 22 Q. Okay. How frequently was that emptied?
- 23 A. It was about a twice a week deal. There again,
24 depending on how good business was.
- 25 MR. OSLAN: Okay. Well, why don't we

1 take a lunch break and we'll pick it up after
2 lunch.

3 (Whereupon the statement was
4 recessed to 12:59 p.m. the same
5 date.)

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1 MR. OSLAN: Mr. Perrin, we're back on
2 the record.

3 EXAMINATION (Continued)

4 BY MR. OSLAN:

5 Q. You mentioned that you recalled another name of
6 somebody that worked with you at the landfill.
7 Who was that?

8 A. His name was Ron Ritter.

9 Q. Is he still in the Elkhart area, or do you know?

10 A. I have no idea. I haven't seen him for a long
11 time.

12 Q. Well, thanks for recalling that.

13 Let's move back into our list of HIMCO
14 customers who disposed of their waste at the
15 County Road 10 Landfill.

16 The next company is ESI Meats Inc.,
17 605 Kesco.

18 Are you familiar with that company?

19 A. Yes, sir.

20 Q. What is their business?

21 A. They were not necessarily a meat processor but a
22 meat wholesaler.

23 Q. And what types of operations did they have
24 there?

25 A. Well, they supplied meats to different chains of

1 restaurants, and most of their product was --
2 would be like cardboard boxes with wax coating
3 on the inside and then a heavy piece of plastic
4 and the meats laid in the boxes.

5 Q. Did ESI dispose of its waste at the County Road
6 10 Landfill?

7 A. Yes, sir.

8 Q. And did you become familiar with the types of
9 waste they disposed of there?

10 A. Yes, sir.

11 Q. What types of waste did they ship to the
12 landfill?

13 A. It was mostly the empty boxes. There might be
14 some meat left in some of the boxes at certain
15 times. And usually the Saran wrap that the meat
16 was wrapped in was bloody in nature.

17 And there again, they would throw away
18 a few skids and things like that.

19 Q. Okay. Did they have metal wiring or something
20 to band up the meat or to band up the --

21 A. There were -- yes, possibly. I believe there
22 was some that had a metal wire around them, and
23 then a lot of them had kind of like a nylon
24 strap or a plastic strap baling.

25 Q. Okay. Do you recall any other sorts of waste

1 that you picked up from ESI?

2 A. No, sir.

3 Q. What size container did ESI have back then?

4 A. I believe they had a 48 there.

5 Q. And how frequently was that container emptied?

6 A. I would say about once a week.

7 Q. Are you aware of any other companies that were
8 picking up ESI's waste during that period?

9 A. No, sir.

10 Q. The next company is Easco, E-a-s-c-o, Aluminum
11 at 23841 Ready Drive.

12 Do you know that company?

13 A. Yes, sir.

14 Q. What business are they in?

15 A. They were in the aluminum extrusion business
16 also.

17 Q. Okay. Did Easco dispose of its waste at the
18 County Road 10 Landfill?

19 A. Yes, sir.

20 Q. Did you become familiar with the types of waste
21 they sent there?

22 A. Yes, sir.

23 Q. Did they dispose of scrap plastics?

24 A. No. It was more of the aluminum, anodized metal
25 or whatever you call it.

- 1 Q. I'm sorry, I was looking at the wrong note.
2 Scrap aluminum?
- 3 A. Yes.
- 4 Q. And metal shavings?
- 5 A. Yes.
- 6 Q. Did they use -- or I'm sorry, strike that.
7 Did they dispose of cutting oils or
8 wastes with cutting oils on them?
- 9 A. Yes.
- 10 Q. Did they dispose of any degreasers or solvents?
- 11 A. Yes.
- 12 Q. Okay. Did they dispose of any machining oils?
- 13 A. No.
- 14 Q. I assume you also picked up their general office
15 waste as well?
- 16 A. Right.
- 17 Q. Do you recall any other sorts of waste that
18 Easco sent to the County Road 10 Landfill?
- 19 A. None other than I'm sure they had skids along
20 with theirs and bandings and long boxes,
21 cardboard and corrugated boxes.
- 22 Q. What size container did Easco have?
- 23 A. I believe they had a 42-yard.
- 24 Q. How often would that be picked up?
- 25 A. I would say on the average of once a week.

- 1 Q. The next company is Eaz-Lift Spring Corp. --
- 2 A. Yes.
- 3 Q. -- at 1318 West Bristol.
- 4 A. Yes, sir.
- 5 Q. What type of company was that?
- 6 A. Well, they -- Eaz-Lift Spring made hitches for
- 7 mobile homes.
- 8 Q. Did they dispose of their waste at the landfill?
- 9 A. Yes.
- 10 Q. And do you know the type of waste they sent
- 11 there?
- 12 A. Yes. They had a lot of banding, they had skids,
- 13 and they had discarded paint cans.
- 14 Q. Did the paint cans have residues in them?
- 15 A. Yes.
- 16 Q. Did they do any welding?
- 17 A. Yes.
- 18 Q. Did they dispose of soldering agents --
- 19 A. Yes.
- 20 Q. -- and fluxes?
- 21 A. Yes.
- 22 Q. Okay. Did they also have skids and --
- 23 A. Yes, sir.
- 24 Q. -- banding?
- 25 A. Yes, sir.

1 Q. Do you recall any other waste that you picked up
2 from Eaz-Lift?

3 A. No, sir.

4 Q. What size container did they have?

5 A. I they had a 16.

6 Q. And how often was that emptied?

7 A. Probably on an average of once a week also.

8 Q. Okay. The next customer is Eby Ford Sales,
9 Inc., 2714 Elkhart Road.

10 What did they do?

11 A. That was a Ford dealership.

12 Q. Did they also do repair and maintenance of
13 automobiles?

14 A. Yes, sir.

15 Q. Did they dispose of their waste at the County
16 Road 10 Landfill?

17 A. Yes, sir.

18 Q. And do you know the types of waste they sent
19 there?

20 A. Yes, sir. It's the average automobile
21 dealership. They might throw away old bumpers.
22 And they service cars there also, so you would
23 have your empty oil cans and your air cleaners
24 and your oil filters and oily rags and the
25 office supplies.

1 Q. Did they send old tires?

2 A. Yes, sir.

3 Q. Did they send used batteries?

4 A. A possibility, yes, sir.

5 Q. Okay. Do you believe that they did send
6 batteries?

7 A. Yes, sir.

8 Q. Did they send old engine parts with oil on them?

9 A. Yes, sir.

10 Q. And did they send automobile fluids that had
11 been drained from cars, brake fluids or anything
12 like that?

13 A. No, sir.

14 Q. Okay. I didn't mean to say that they were
15 sending that in large volumes, but was that type
16 of waste included with the waste they sent to
17 the landfill?

18 A. Yes. In floor sweepings, I'm sure.

19 Q. Floor sweepings or oily rags?

20 A. Right.

21 Q. Do you recall any other types of waste from Eby
22 Ford?

23 A. No. I'm sure they've had a few skids and things
24 like that of that nature, wooden skids that
25 engines come in on or transmissions or

1 whatever.

2 Q. Okay. What size container did Eby Ford have?

3 A. I think they had a 16 there.

4 Q. How often would that be picked up?

5 A. On about a once a week basis.

6 Q. Okay.

7 A. I believe they were a call-in.

8 Q. The next customer I have is Eddie's Marathon

9 Service, 2701 Prairie Street.

10 A. Uh-huh.

11 Q. Is that a service station?

12 A. Yes, sir. That was a full-service service

13 station.

14 Q. So did they also do automobile maintenance and

15 repair?

16 A. Yes, sir.

17 Q. Did they dispose of their waste at the County

18 Road 10 Landfill?

19 A. Yes, sir.

20 Q. And are you familiar with the types of waste

21 they sent there?

22 A. Yes, sir.

23 Q. Did they send used tires?

24 A. Yes, sir.

25 Q. Used batteries?

1 A. I would say possibly, yes, sir.

2 Q. Oily rags and --

3 A. Yes, sir.

4 Q. -- car parts with oils on it?

5 A. Yes, sir.

6 Q. Automobile engine fluids on rags or on parts?

7 A. Right. Yes, sir.

8 Q. Okay. Did you also pick up the general trash

9 from Eddie's?

10 A. Yes, sir.

11 Q. You're not aware of any other companies that

12 picked up trash during that period of time at

13 Eddie's, are you?

14 A. No, sir.

15 Q. What size container did they have?

16 A. I believe he had a 4-yard front-end loader.

17 Q. And how often was that picked up?

18 A. I believe they were on a once a week pickup.

19 Q. The next customer is Elcona Foods, Inc., 24402

20 County Road 45.

21 Do you know that company?

22 A. Yes, sir.

23 Q. What do they do?

24 A. Well, they were another food processor in

25 meats. And they would have the same cardboard

1 boxes with like cellophane inside the boxes
2 which would be bloody from where the blood run
3 out of the meat. And they had skids and some
4 banding material and just general cleanup. And
5 there would be parts of food scraps left in some
6 of the boxes also, meat scraps and tallow.

7 Q. And they disposed of those wastes at the County
8 Road 10 Landfill?

9 A. Yes, sir.

10 Q. Can you think of any other sorts of waste that
11 they had at Elcona Foods? Did they have like a
12 metal wire to tie things up with or --

13 A. Yes, sir.

14 Q. And did they dispose of that wire at the
15 landfill?

16 A. Yes, sir.

17 Q. Okay. What size container did Elcona Foods
18 have?

19 A. I believe they had a 48 out there.

20 Q. And how frequently was that cleaned out?

21 A. That was probably on a once a week basis, and I
22 believe every now and then they'd call up and
23 ask for extra.

24 Q. Okay. The next company I have is Elixir,
25 E-l-i-x-i-r, Corporation, 2040 Industrial

1 Parkway.

2 Are you familiar with that company?

3 A. Yes, sir.

4 Q. What type of company is Elixir?

5 A. They were -- they manufactured doors, aluminum
6 doors, aluminum doorjams.

7 Q. Did Elixir dispose of their waste at the County
8 Road 10 Landfill?

9 A. Yes, sir.

10 Q. And did you become familiar with the types of
11 waste they sent there?

12 A. Yes, sir.

13 Q. And what types of waste would they send there?

14 A. Well, they would have metal clippings from where
15 they made doorjams and cut the 45s, and they
16 would have scrap pieces of aluminum. They might
17 even have broken glass with the aluminum glass
18 casing around it.

19 Q. Did they dispose of adhesives and glues?

20 A. Yes, sir.

21 Q. Did they dispose of solvents?

22 A. Yes, sir.

23 Q. Did they dispose of empty -- strike that.

24 Did they dispose of cans with solvent
25 residues in them?

- 1 A. Yes, sir.
- 2 Q. Okay. How about barrels, did they send any
3 barrels with solvent residues?
- 4 A. Yes, sir.
- 5 Q. Did they dispose of oily rags?
- 6 A. Yes, sir.
- 7 Q. Okay. How about degreasers?
- 8 A. Yes, sir.
- 9 Q. Okay. And I assume they had skids and banding
10 as well?
- 11 A. Yes, sir.
- 12 Q. Can you think of any other types of waste that
13 Elixir Corporation --
- 14 A. Yes, sir. I think Elixir used to paint some of
15 these doors.
- 16 Q. So did they dispose of paint wastes at the
17 landfill?
- 18 A. Yes, sir.
- 19 Q. And how about paint thinner?
- 20 A. Yes, sir.
- 21 Q. Okay. Can you think of any other wastes from
22 Elixir Corporation?
- 23 A. No, sir.
- 24 Q. What size container did Elixir have?
- 25 A. They had a 48-yard, and I placed the stationary

1 compactor at Elixir.

2 Q. How often would their container be cleaned out
3 or emptied?

4 A. I'd say on the average of about twice a week.
5 There again, it would depend on how the trailer
6 industry was moving.

7 Q. Right. And are you aware of any companies that
8 were picking up waste from Elixir at the same
9 time that you were disposing of their waste at
10 the landfill?

11 A. No, sir.

12 Q. The next company I have is Elkhart Air Service,
13 27658 County Road 6.

14 Are you familiar with that company?

15 A. Yes, sir.

16 Q. What do they do?

17 A. It was a small 4-yard container out at the
18 airport. And I assume that they serviced
19 aircraft.

20 Q. Did they dispose of their waste at the County
21 Road 10 Landfill?

22 A. Yes, sir.

23 Q. Did you become familiar with the types of waste
24 they sent there?

25 A. Yes, sir. .

1 Q. What types of waste did the Elkhart Air Service
2 dispose of at the landfill?

3 A. Well, I know you could see when you drove up
4 there to pick up the container that everything
5 was awful clean in there, and I'm sure they had
6 oily rags and some metals from parts off the
7 engines. And then the normal trash that it
8 would take to run an office with.

9 Q. Did they dispose of degreasers?

10 A. I would say yes, sir.

11 Q. Do you recall any other types of waste that the
12 Elkhart Air Service disposed of at the County
13 Road 10 Landfill?

14 A. No, sir.

15 Q. You mentioned they had a 4-yard container. How
16 often was that cleaned out?

17 A. I think they were on a once a week service.

18 Q. And are you aware of any other companies that
19 picked up waste from the Elkhart Air Service
20 during the same period of time?

21 A. No, sir.

22 Q. The next company I have is the Elkhart Bedding
23 Company, 2124 Sterling Avenue.

24 A. Yes, sir.

25 Q. What business were they in?

1 A. They made box springs and mattresses.

2 Q. And did the Elkhart Bedding Company dispose of
3 their wastes at the County Road 10 Landfill?

4 A. Yes, sir.

5 Q. And are you familiar with what they sent there?

6 A. Yes, sir.

7 Q. What types of waste did they send there?

8 A. Lots and lots of bed springs. And some of the
9 bed springs would just have about a quarter inch
10 metal around the top of them, some of the bed
11 springs were just dumped in a pile, and some of
12 the bed springs they would start to have the
13 wooden frame built around them. And then there
14 was also scraps of material where they covered
15 the bed springs. And I'm sure there was some
16 banding, I'm sure there was some skids, and the
17 general paper that it took to run the office
18 part of it.

19 Q. Did they use oils and greases in their
20 manufacturing process?

21 A. I didn't notice that, no, sir.

22 Q. Okay. So you don't recall them disposing of any
23 oily rags?

24 A. No, sir.

25 Q. What size container did Elkhart Bedding have?

1 A. They had a 16.

2 Q. And how often was that cleaned out?

3 A. I would say on the average of at least once a
4 week.

5 Q. The next company is Elkhart Brass Manufacturing,
6 Inc., at 1302 West Beardsley Avenue.

7 Do you know that company?

8 A. Yes, sir.

9 Q. What do they do?

10 A. Elkhart Brass is a manufacturer of fire-fighting
11 nozzles and equipment. And they had a foundry
12 there, and they had a foundry container.

13 Q. Did they dispose of their waste at the County
14 Road 10 Landfill?

15 A. Yes, sir.

16 Q. And do you know what types of waste they sent
17 there?

18 A. Yes, sir.

19 Q. You mentioned a foundry. Did they send foundry
20 sand to the landfill?

21 A. Yes, sir.

22 Q. Did they also send scrap metals?

23 A. Yes, sir.

24 Q. Did they dispose of solvents --

25 A. Yes, sir.

1 Q. -- at the landfill?

2 Did they dispose of any degreasers at
3 the landfill?

4 A. Yes, sir.

5 Q. Did they dispose of oily rags or cans with oil
6 in them at the landfill?

7 A. Yes, sir.

8 Q. Can you think of any other waste that Elkhart
9 Brass sent to the landfill?

10 A. No, sir. But I'm sure we have got brass
11 shavings or filings from Elkhart Brass.

12 Q. How about ingots, did they send any ingots, used
13 ingots, over to the landfill?

14 A. I don't believe so.

15 Q. Okay.

16 A. There might have been a little bit in the
17 foundry sand but not anything significant.

18 Q. Did they do any painting as you recall?

19 A. Not to my knowledge.

20 Q. Okay. What size container did Elkhart Brass
21 have?

22 A. I believe they had an 8-yard and I think they
23 had a 48-yard.

24 Q. Was the 8-yard for the foundry sand?

25 A. Yes.

1 Q. How often would the 8-yarder be cleaned out?

2 A. I'd say about once every two weeks on the
3 foundry sand, and the other container they had
4 there, probably on the average of once a week.

5 Now, they also had a lot of banding
6 and skids and --

7 Q. Okay. Can you think of any other waste that
8 Elkhart Brass sent to the landfill?

9 A. No, sir.

10 Q. Are you aware of any companies that were picking
11 up waste from Elkhart Brass when you were taking
12 their waste to the landfill?

13 A. No, sir.

14 Q. The next company is Elkhart Bridge and Iron Co.,
15 929 North Michigan Street.

16 Do you know that company?

17 A. Yes, sir.

18 Q. What business were they in?

19 A. They were a bridge manufacturer and iron
20 company. They would fabricate about anything
21 you wanted fabricated.

22 Q. Did they dispose of their waste at the County
23 Road 10 Landfill?

24 A. Yes, sir.

25 Q. What type of materials did they send to the

1 landfill?

2 A. Well, they had -- they had big band saws in
3 there that they would cut all sizes of metal
4 with. So there would be shavings from the band
5 saws, there would be floor sweepings, there
6 would be paint, there would be paint thinner
7 cans, there would be -- to give you an example,
8 they built the Mackinac Bridge, and they put it
9 together on the inside of that building with
10 nuts and bolts so that when it went to be built
11 in Mackinac City, everything matched and
12 everything fit. And at that time they would
13 take a brand new bolt and a nut and put
14 everything together and make sure it was right,
15 and then they'd just tear it apart. And a lot
16 of the metal they threw into a container that
17 was hauled to the -- but yet if a stray nut or
18 something and you swept the floor, it would be
19 there with the trash.

20 Q. Did they dispose of cutting oils with their
21 waste --

22 A. Yes.

23 Q. -- at the landfill?

24 A. Yes, sir.

25 Q. How about degreasers, did they use degreasers

1 there?

2 A. Yes, sir.

3 Q. Okay. So do you believe they disposed of
4 degreasers at the landfill?

5 A. Yes, sir.

6 Q. How about cleaning fluids, industrial cleaning
7 fluids?

8 A. Yes, sir.

9 Q. Do you believe they disposed of containers
10 having industrial cleaning fluid residues in
11 them?

12 A. Yes, sir. And empty paints cans.

13 Q. The paint cans had some residue in them?

14 A. Yes, sir.

15 Q. Okay. Can you think of any other waste that
16 Elkhart Bridge and Iron sent to the landfill?

17 A. None other than their office was right there
18 also and a lot of that trash went into that.

19 Q. How large a container did Elkhart Bridge and
20 Iron have?

21 A. I believe they had two 16-yards and a 4-yard.

22 Q. How frequently were those containers emptied?

23 A. I would say there again it depended on how busy
24 they were but an average of once a week.

25 MR. OSLAN: Why don't we take a

1 two-minute break.

2 (Whereupon a short recess was
3 taken.)

4 BY MR. OSLAN:

5 Q. The next company is Elkhart Distributing Corp.,
6 640 Riverview Avenue.

7 Do you know that firm?

8 A. Yes, sir.

9 Q. What do they do?

10 A. They were a beverage distributor.

11 Q. Did they send their garbage or waste to the
12 County Road 10 Landfill?

13 A. Yes.

14 Q. What did they send there?

15 A. Mostly just empty cardboard boxes, a few skids,
16 their paperwork from the office.

17 Q. Okay. Do you recall anything else?

18 A. No, sir. Might be a few broken beer bottles,
19 glass.

20 Q. The next company I have is Elkhart Foundry and
21 Machine, 318 Elkhart.

22 Do you know that company?

23 A. Yes, sir.

24 Q. Are they still in business?

25 A. I don't think so.

- 1 Q. What were they doing?
- 2 A. They were just a little small foundry and a
3 machine shop.
- 4 Q. Did they dispose of their waste at the County
5 Road 10 Landfill?
- 6 A. Yes, sir.
- 7 Q. And what types of waste did they send there?
- 8 A. Mostly foundry sand, and I think they had an
9 8-yard foundry container. And then they did a
10 little boring work and a little machine work and
11 probably had oily rags.
- 12 Q. Did they dispose of metal shavings or metal --
- 13 A. Yes.
- 14 Q. -- particles?
- 15 A. Yes.
- 16 Q. Did they dispose of degreasers?
- 17 A. I would say yes.
- 18 Q. Did they dispose of solvents?
- 19 A. Yes.
- 20 Q. How about ingots, did they send any ingots over?
- 21 A. There might be a few pieces of the ingots in the
22 foundry sand, yes.
- 23 Q. How about oily rags and cans containing oil
24 residues?
- 25 A. Yes.

1 Q. Do you recall any other types of waste that
2 Elkhart Foundry and Machine sent to the
3 landfill?

4 A. None other than I'm sure they had some cardboard
5 and I'm sure they had some skids and empty sand
6 bags from running the foundry.

7 Q. What size container did they have besides the
8 8-yard, or was it just an 8-yard?

9 A. I believe it was just an 8-yard. I think they
10 pretty well combined everything together.

11 Q. How frequently was that emptied out?

12 A. That's probably about a once a week deal too.

13 Q. Were there any other companies that were picking
14 up their waste at that time?

15 A. Not to my knowledge, no, sir.

16 Q. The next company is Elkhart General Hospital,
17 600 East Boulevard.

18 A. Yes, sir.

19 Q. Did Elkhart General Hospital dispose of its
20 waste at the County Road 10 Landfill?

21 A. Yes, sir.

22 Q. And are you familiar with the types of waste
23 they sent there?

24 A. Yes, sir.

25 Q. What types of waste did the Elkhart General

1 Hospital dispose of at the landfill?

2 A. Well, everything from bloody sheets to food
3 scraps from the patients and the little courtesy
4 corner they have in the hospital, boxes,
5 needles, syringes, the bottles that -- the IV
6 bottles.

7 Q. How about drugs, empty bottles of --

8 A. Yes, there were, but I -- I didn't pay that
9 close attention, but I know they had a rubber
10 where they could stick a needle in it and pull
11 the juice out of it.

12 Q. Okay. Do they have any kind of maintenance
13 operations for vehicles or anything like that
14 there?

15 A. Not to my knowledge.

16 Q. Do you recall any other types of waste that
17 Elkhart General Hospital sent to the site?

18 A. Well, I'm sure -- there was construction that
19 went on down there over a period of years, and
20 when that would happen, we would get brick and
21 maybe roofing material and maybe a little bit of
22 everything from regular normal construction of
23 the hospital.

24 Q. Okay. Can you think of anything else?

25 A. I'm sure we got a few pieces of pipe from their

1 air conditioning units and heating units and so
2 on. And I think at one time they had a little
3 incinerator that we might get a little bit of
4 incinerator ash, but I think it was dumped right
5 in with the trash.

6 Q. Okay. What size container did Elkhart General
7 have?

8 A. At that time they had two specially built, and I
9 believe we classified them as 8-yards but they
10 were for front-end loaders. It might have only
11 been six. But we built a special cover over the
12 top of them so the trash wouldn't blow out and
13 they could walk up there and throw it in and
14 shut the doors.

15 Q. How frequently would you empty out those
16 containers?

17 A. I believe we hit Elkhart General Hospital every
18 day, seven days a week.

19 Q. Are you aware of any companies that were picking
20 up their waste during that same time?

21 A. No, sir.

22 Q. The next company is Elkhart Glass Company, Inc.,
23 310 East Jackson Boulevard.

24 Do you know that company?

25 A. Yes, sir.

1 Q. What do they do?

2 A. Well, they were -- mostly dealt in glass.

3 Q. Were they a manufacturer or a supplier or --

4 A. No, they didn't manufacture glass. They were
5 just like a supplier, I guess you would call
6 them.

7 Q. Did they dispose of their waste at the County
8 Road 10 Landfill?

9 A. Yes.

10 Q. What types of waste did they send there?

11 A. Lots and lots of broken glass, broken mirrors,
12 and a lot of skids and a lot of banding.

13 Q. Do you recall any other types of waste that
14 Elkhart Glass sent to the landfill?

15 A. Nothing other than normal -- whatever it takes
16 to run the office type.

17 Q. Okay. What size container did they have?

18 A. I believe Elkhart glass had an 8-yard.

19 Q. And how frequently was that emptied?

20 A. I believe they were on a call-in basis. I'd say
21 probably once every two weeks.

22 Q. The next company or customer is Elkhart Lincoln
23 Mercury Inc., 1005 North Nappanee Street.

24 A. Uh-huh.

25 Q. I assume that's an auto dealership?

1 A. Yes, sir.

2 Q. Do they also do automobile repair and
3 maintenance?

4 A. Yes, sir.

5 Q. Did they dispose of their waste at the County
6 Road 10 Landfill?

7 A. Yes, sir.

8 Q. Are you familiar with the types of waste they
9 disposed of there?

10 A. Yes, sir.

11 Q. Did they dispose of used engine parts?

12 A. Yes, sir.

13 Q. And used batteries?

14 A. I would say yes. Not commonly, but if there's
15 an automobile wreck and the battery got really
16 banged up, I'm sure it was in there.

17 Q. So from time to time they would dispose of used
18 batteries?

19 A. Yes, sir.

20 Q. How about used tires?

21 A. Yes, sir.

22 Q. Did they dispose of solvents or cans having
23 solvent residues in them?

24 A. Yes, sir.

25 Q. How about degreasers?

1 A. Yes, sir.

2 Q. Oily rags with these various substances on them?

3 A. Yes, sir.

4 Q. How about automobile parts?

5 A. Yes, sir.

6 Q. Do you recall any other types of waste that you

7 picked up from Elkhart Lincoln Mercury?

8 A. Yes, sir. I believe that they had their own

9 paint shop too, so they did a lot of body

10 repainting.

11 Q. Did they dispose of paint waste at the landfill?

12 A. Yes, sir.

13 Q. Anything else?

14 A. No, sir.

15 Q. What size container did Elkhart Lincoln Mercury

16 have?

17 A. I believe they had a 16-yard.

18 Q. How frequently was that cleaned out?

19 A. Probably on an average of once a week.

20 Q. Are you aware of any other companies that were

21 picking up waste from Elkhart Lincoln Mercury at

22 that time?

23 A. No, sir.

24 Q. The next company is Elkhart Machine and Tool at

25 26687 Comet.

1 Do you know that firm?

2 A. No, sir.

3 Q. The next company I have is Elkhart Mobile Home
4 Service, Rural Route 3, Box 14, Mishawaka Road.

5 Do you know that firm?

6 A. Yes, sir.

7 Q. What business were they in?

8 A. Just a mobile home repair service.

9 Q. What types of repairs would they perform?

10 A. I believe they'd do anything you wanted done.

11 Q. Did they dispose of their waste at the County
12 Road 10 Landfill?

13 A. Yes, sir.

14 Q. Okay. And are you familiar with the types of
15 waste they disposed of there?

16 A. Yes, sir.

17 Q. What kinds of waste did Elkhart Mobile Home send
18 to the landfill?

19 A. Oh, just maybe -- maybe a little plumbing
20 products, maybe some -- if a mobile home froze
21 up in the wintertime, they'd have some copper
22 lines. They might have some parts from a
23 furnace where they repaired it. And cardboard
24 and paper and whatever, an old door. Because
25 they would do about anything you'd want done on

1 a mobile home.

2 Q. What size container did they have?

3 A. I believe that was a front-end loader, probably
4 a 4-yard.

5 Q. How frequently was their container cleaned out?

6 A. Oh, it was probably on a once a week deal.

7 Q. The next customer I have is Elkhart Municipal
8 Airport.

9 Did they dispose of their trash at the
10 County Road 10 Landfill?

11 A. Yes, sir.

12 Q. And are you familiar with the waste they
13 disposed at the landfill?

14 A. Yes, sir.

15 Q. And what types of waste did they dispose of
16 there?

17 A. I believe that was mostly -- when they had their
18 little airport up there for the everyday
19 passenger commuter flights, we had a 4-yard
20 container up there, and it was nothing more than
21 whatever it took to run the municipal part of
22 the airport.

23 Q. Okay. Was there --

24 A. Pop cans and office supplies and paper.

25 Q. Okay. How often would their 4-yard container be

1 emptied out?

2 A. I think that was done on a once a week basis

3 also.

4 Q. The next customer I have is Elkhart Rubber

5 Works, Inc., on Oakland Avenue.

6 A. Yes, sir.

7 Q. Do you know them?

8 A. Yes, sir.

9 Q. And what business are they in?

10 A. Well, they were in the rubber works business. I

11 don't believe they made tires there. They might

12 have at one time. But they made like rubber

13 belting for conveyors at a gravel pit. I even

14 believe they stamped out floor mats and maybe

15 truck mud flaps and --

16 Q. Did Elkhart Rubber works dispose of their waste

17 at the County Road 10 Landfill?

18 A. Yes, sir.

19 Q. And are you familiar with the types of waste

20 they sent there?

21 A. Yes, sir.

22 Q. What types of waste did Elkhart Rubber dispose

23 of at the landfill?

24 A. Well, cut-off strips of where they would size

25 these belts or whatever piece of rubber they

1 were working on. And they also had what they
2 call rubber black, and it was a real, real fine
3 powder material, and if it would get on your
4 skin, you wouldn't even notice it, but if you
5 took your finger and touched your face, you
6 looked like an Indian because it would just turn
7 black just like that. That's one of the reasons
8 I really remember the place.

9 Q. So they disposed of cans with rubber black
10 residues in it?

11 A. Well, yeah. The cans or boxes that they came
12 in, and it would just be kind of loose with
13 this. Now, whether it came from where they cut
14 it, I'm not sure. But it was --

15 Q. Okay. Did they use degreasers in their
16 manufacturing operations?

17 A. I don't know, sir.

18 Q. How about grease to assist in manufacturing?

19 A. I would say yes, they did.

20 Q. So did they dispose of oily rags?

21 A. Yes, sir.

22 Q. Do you recall anything else that Elkhart Rubber
23 Works disposed of at the landfill?

24 A. No. I'm sure again they had skids and some
25 banding and some stuff like that.

1 Q. What size container did they have?

2 A. I believe they had a 16-yard container down
3 there. Maybe two of them.

4 Q. And how often would their container or
5 containers be emptied?

6 A. There again, it would depend on business. If I
7 averaged it out, I'd say at least once a week
8 and at times more.

9 Q. Are you aware of any other companies that were
10 picking their waste up at that time?

11 A. No, sir.

12 Q. And the next company or customer I have is
13 Elkhart Welding and Boiler, 2132 South Main
14 Street.

15 A. Uh-huh.

16 Q. Do you know that company?

17 A. Yes, sir.

18 Q. What do they do?

19 A. Well, they would do welding and painting. They
20 would kind of do whatever you wanted them to.

21 Q. Did they dispose of their waste at the County
22 Road 10 Landfill?

23 A. Yes.

24 Q. And are you familiar with the types of waste
25 they disposed of there?

- 1 A. Yes, sir.
- 2 Q. Did they dispose of paint wastes at the
3 landfill?
- 4 A. Yes, sir.
- 5 Q. And you mentioned welding, so did they dispose
6 of soldering agents?
- 7 A. I would say.
- 8 Q. Fluxes?
- 9 A. Yes, sir.
- 10 Q. Do you recall any other types of waste that
11 Elkhart Welding and Boiler sent to the landfill?
- 12 A. Yes, sir. It seemed to me like every now and
13 then you would get the brick from -- you know,
14 on the inside of these boiler -- fire brick, I
15 guess they call them.
- 16 Q. And would there be any oils or residues on the
17 brick?
- 18 A. No, not so much. Just black soot.
- 19 Q. Okay. Did they dispose of oily rags and oily
20 residues at all?
- 21 A. Yes.
- 22 Q. How about did they use degreasers at all?
- 23 A. Yes.
- 24 Q. So do you believe that they disposed of
25 degreasers with their waste?

1 A. Yes.

2 Q. Do you recall any other types of waste that
3 Elkhart Welding and Boiler sent to the landfill?

4 A. None other than the normal cardboard and skids,
5 and I'm sure they had some banding products
6 too.

7 Q. What size container did they have?

8 A. I believe they had a 16-yard.

9 Q. How frequently was their container emptied?

10 A. Probably on a once a week basis at least.

11 Q. Was anyone else picking up their waste at that
12 time?

13 A. Not to my knowledge, no, sir.

14 Q. The next customer I have is Elkhart Wood
15 Products, 2300 California Road.

16 Do you recall that company?

17 A. Yes, sir.

18 Q. What business were they in?

19 A. I believe that they were making wooden pieces
20 for the band instrument industry.

21 Q. Did Elkhart Wood Products dispose of their waste
22 at the County Road 10 Landfill?

23 A. Yes, sir.

24 Q. And are you familiar with the types of waste
25 they disposed of there?

1 A. Yes, sir.

2 Q. What types of waste did Elkhart Wood Products
3 dispose of there?

4 A. Mostly wood and sawdust.

5 Q. Did they dispose of any glue or epoxy wastes?

6 A. Yes, I believe there were glue products.

7 Q. How about any cleaning agents or solvents?

8 A. Not to my knowledge, no, sir.

9 Q. Okay. Do you recall any other waste that
10 Elkhart Wood Products disposed of at the
11 landfill?

12 A. No, sir.

13 Q. What size container did they have?

14 A. I believe they had a 16-yard also.

15 Q. Again how frequently was that emptied?

16 A. Probably on the average of once a week.

17 MR. OSLAN: Why don't we take a
18 two-minute break.

19 (Whereupon a short recess was
20 taken.)

21 BY MR. OSLAN:

22 Q. The next company is Bill Elsey Olds Cadillac --

23 A. Yes, sir.

24 Q. -- at 711 North Nappanee Street.

25 A. Yes, sir.

1 Q. Do they do auto maintenance and repair at that
2 dealership?

3 A. Yes. It was a full dealership.

4 Q. And did they dispose of their waste at the
5 County Road 10 Landfill?

6 A. Yes.

7 Q. What types of waste did they send there?

8 A. Old tires, old car parts, empty oil cans, air
9 cleaners, oily rags, maybe a bumper, fender or
10 two, empty paint cans, because they also had a
11 body shop there.

12 Q. So they sent paint waste to the landfill?

13 A. Right.

14 Q. Did they send any used batteries there?

15 A. Probably, yes, sir.

16 Q. How about degreasers?

17 A. I would say yes, probably in the floor sweepings
18 there was degreaser.

19 Q. How about automobile engine fluids, brake fluid,
20 transmission fluids?

21 A. Yes, I would say.

22 Q. Cans with residues of those in them?

23 A. Yes.

24 Q. Do you recall any other specific types of waste
25 that the Bill Elsey dealership sent to the

1 landfill?

2 A. Not really. I'm sure they had a little bit of
3 wood and paper and cardboard. Probably some
4 plastic strips from automobiles.

5 Q. Okay. What size container did they have?

6 A. Bill Elsey I think had a 4-yard container.
7 Maybe two of them.

8 Q. And how often would their container be emptied?

9 A. Probably once or twice a week.

10 Q. Were there any other companies picking up their
11 waste at that time?

12 A. Not to my knowledge, no.

13 Q. The next company I have is Emmert Trailer, Inc.,
14 614 Mishawaka Street.

15 A. Yes, sir.

16 Q. What type of company was that?

17 A. They repaired damaged semi-trailers or truck
18 beds or whatever.

19 Q. Are they still in business today?

20 A. I don't believe so.

21 Q. Did they dispose of their waste at the County
22 Road 10 Landfill?

23 A. Yes, sir.

24 Q. And do you know what types of waste they sent
25 there?

1 A. Yes, sir.

2 Q. What types of waste did they send there?

3 A. They would have some metal pieces that weren't

4 really salvageable to go to the scrap yard.

5 They would have hinges from doors of trucks.

6 They would have the welding rods from repairs.

7 Kind of rust -- a lot of that stuff would be

8 awful rusty, and they would just sweep that all

9 up and throw it into the container.

10 Q. Did they do any painting?

11 A. Yes, sir.

12 Q. So did they dispose of paint wastes at the

13 landfill?

14 A. Yes, sir.

15 Q. How about any sealants or --

16 A. Yes, sir.

17 Q. Did they dispose of sealants at the landfill?

18 A. Yes, sir.

19 Q. And was that in cans or on rags or both?

20 A. Probably a little residue of them in empty cans

21 and on the rags where they cleaned up.

22 Q. Do you recall any other types of waste that

23 Emmert Trailer disposed of at the landfill?

24 A. No. I'm sure they had some skids and probably

25 some banding and this type of stuff and the

1 normal waste that they would use in their
2 office.

3 Q. What size container did they have?

4 A. I believe they had a 16-yard.

5 Q. How frequently was their container cleaned out?

6 A. I believe they were on a call-in basis. There
7 again, I would say, if I had to average it out,
8 once every two weeks.

9 Q. Was there anybody else picking up waste from
10 Emmert Trailer at that time?

11 A. Not to my knowledge, no, sir.

12 Q. The next company or customer I have is Evans
13 Products Company, 1810 Conant Street.

14 Do you know them?

15 A. The name sounds familiar, but to recall their
16 trash, no, sir.

17 Q. Okay. The next company I have then is
18 Experimental Nylon, P. O. Box 266.

19 Do you recall them?

20 A. No, sir.

21 Q. The next company I have is Faries-McMeekan,
22 Inc., P. O. Box 2388.

23 Are you familiar with that company?

24 A. Yes, sir.

25 Q. And what business are they in?

- 1 A. They manufactured metal mirrors.
- 2 Q. For automobiles or RVs or just general?
- 3 A. For RVs. I mean just general and mobile home,
- 4 yeah. Regular mobile homes, the big size.
- 5 Q. Did Faries-McMeekan dispose of their waste at
- 6 the County Road 10 Landfill?
- 7 A. Yes.
- 8 Q. Are you familiar with the types of waste they
- 9 sent there?
- 10 A. Yes.
- 11 Q. What types of waste did they send there?
- 12 A. Broken glass, maybe a little metal framing that
- 13 went around these mirrors, and usually since
- 14 they handled glass and that type thing, lots of
- 15 skids and banding material, wood.
- 16 Q. Did they generate oily rags and those sorts of
- 17 wastes in their manufacturing?
- 18 A. Not to my knowledge, no, sir.
- 19 Q. Okay. Do you recall any industrial cleaning --
- 20 A. No, sir.
- 21 Q. What size container did they have?
- 22 A. I believe they had an 8-yard.
- 23 Q. And how frequently was that container emptied?
- 24 A. I'd say on an average of once every two weeks.
- 25 maybe.

1 Q. The next company I have is Pas Auto Work #513,
2 Pierre Moran 513.

3 Do you know that company?

4 A. I know the company. I can recall nothing about
5 -- I almost believe that was after County Road
6 26. I mean after --

7 Q. After County Road 10?

8 A. County Road 10.

9 Q. Okay. The next customer I have is Fidler
10 Concrete, 1500 West Bristol.

11 A. Uh-huh.

12 Q. Do you know that company?

13 A. Yes, sir.

14 Q. What do they do?

15 A. They're a concrete brick manufacturer, block.

16 Q. Did they dispose of their waste at County Road
17 10?

18 A. Yes, sir.

19 Q. What types of waste did they send there?

20 A. Oh, there's quite a bit of their concrete,
21 broken block, brick, cement bags where they pour
22 their own block. They made these cement
23 run-offs for downspots on your home. They made
24 the curb parking cement blocks where you pull
25 your car up, you know. They might be painted

1 yellow, but they're usually made with cement.

2 And they -- there again, they had
3 skids, they had wood, they had their office
4 paperwork.

5 Q. Okay. Did they --

6 A. And I believe -- I believe you could -- might
7 have got -- I believe they used to sell the
8 asphalt sealer there, and you can buy transits
9 there. You can buy a little bit of everything.

10 Q. Did they dispose of any sealers at the landfill?

11 A. Yes. I would say yes.

12 Q. How about oily rags, did they dispose of oily
13 rags at the landfill or --

14 A. Yes. That would be in some of the --

15 Q. Okay. Do you recall anything else about Fidler
16 Concrete?

17 A. There's a possibility there that they might have
18 had a little of the rerod bars that might have
19 been thrown away too that got banged up or
20 damaged and they couldn't use it in the molding
21 of some of these products they supplied.

22 Q. What size container did they have?

23 A. I believe they had the 16-yard also. And I even
24 went up there a time or two with a dumptruck and
25 they loaded the dumptruck with the front-end

1 loader.

2 Q. How frequently would their container be emptied?

3 A. I'd say on the average of once a week.

4 Q. Okay. The next company is Fimmel System, Inc.,
5 500 E Street.

6 Do you know that company?

7 A. Yes, sir.

8 Q. What business were they in?

9 A. I believe that they were making floor scrubbers
10 at that time.

11 Q. Okay. Did Fimmel System dispose of their waste
12 at the landfill?

13 A. Yes.

14 Q. What types of waste did they dispose of?

15 A. Not too much. Mostly paper, cardboard. There
16 again, some skids. Maybe a little electrical
17 cords to run with these floor buffers.

18 Q. Did they dispose of old floor scrubbers or parts
19 from floor scrubbers?

20 A. Yes.

21 Q. Did they dispose of --

22 A. Buffing pads.

23 Q. Buffing pads?

24 A. (Witness nods head.)

25 Q. How about oily rags?

- 1 A. I don't recall that, no, sir.
- 2 Q. Can you recall anything else about Finnel
3 System?
- 4 A. No, sir.
- 5 Q. What size container did they have?
- 6 A. I believe they had a 16 there.
- 7 Q. And how frequently was that emptied?
- 8 A. I believe they were on a call-in basis. I would
9 say maybe once every two weeks.
- 10 Q. The next company I have here is Fleet Supply,
11 1616 South Nappanee Street.
- 12 Are you familiar with that company?
- 13 A. Yes, sir.
- 14 Q. And what was their business?
- 15 A. They were a farm supply store. You could go in
16 there and buy about everything you'd want for
17 your farm, equipment, cattle feed.
- 18 Q. Are they still in business?
- 19 A. No, sir.
- 20 Q. Did Fleet Supply dispose of their waste at the
21 County Road 10 Landfill?
- 22 A. Yes, sir.
- 23 Q. What types of waste did they send there?
- 24 A. Basically cardboard and paper and skids and
25 maybe a bag or two of old feed that the bag had

- 1 busted open and got wet or something like that.
- 2 Q. How about fertilizer?
- 3 A. Yes, there's probably broken bags of fertilizer.
- 4 Q. Okay. Do you recall anything else about Fleet
- 5 Supply's wastes that were disposed of at the
- 6 landfill?
- 7 A. No, sir.
- 8 Q. What size container did Fleet Supply have?
- 9 A. I believe they had a 4-yard. Maybe two of
- 10 them.
- 11 Q. And how frequently would there be a pickup
- 12 there?
- 13 A. Probably once a week. And I think they were
- 14 also on a call-in basis.
- 15 Q. Okay. The next customer is Foamcraft, Inc.,
- 16 5543 East Bonna Avenue.
- 17 Do you know that company?
- 18 A. Yes, sir.
- 19 Q. What business are they in?
- 20 A. Now, I believe that they're the ones that
- 21 produce the foam to make the furniture out of.
- 22 Q. Okay. And did Foamcraft dispose of their waste
- 23 at the County Road 10 Landfill?
- 24 A. Yes.
- 25 Q. Are you familiar with the types of waste they

1 sent there?

2 A. Yes.

3 Q. What did they send there?

4 A. Lots of pieces of foam. It looked like maybe it
5 got too hot or the temperature wasn't just right
6 to make it form correctly.

7 Q. Did they dispose of glues or epoxies?

8 A. I don't believe so. No, sir.

9 Q. Okay. Do you recall any other types of waste
10 that Foamcraft sent to the landfill?

11 A. Yes. Lots of cardboard and they have skids and
12 banding.

13 Q. Anything else?

14 A. No, sir.

15 Q. What size container did Foamcraft have?

16 A. I think they had a 16, and I think they might
17 have went up to the roll-off containers, which
18 would have been a 42-yard.

19 Q. And how frequently would their container be
20 emptied?

21 A. Probably once or twice a week.

22 Q. The next company I have is Foamex Products,
23 Inc., 603 Industrial Parkway.

24 Do you know that company?

25 A. Yes, sir.

1 Q. What business is Foamex Products in?

2 A. Now, there again, I believe they were -- Foamex
3 produced the foam for a lot of other places.

4 Q. So they were a foam manufacturer?

5 A. Right.

6 Q. Did Foamex Products dispose of their waste at
7 County Road 10?

8 A. Yes, they did.

9 Q. And are you familiar with the types of waste
10 they sent there?

11 A. Yes, sir.

12 Q. And what did they send there?

13 A. There again, they sent large pieces of foam that
14 would -- I don't know. They'd be of weird
15 shapes like they were beginning to start the
16 operation and everything just didn't go right or
17 they might have been a little too hot and they
18 burnt like a -- I don't understand just how they
19 done it, but they looked like something happened
20 and they had burnt spots in them.

21 Q. Did they dispose of cans with residues from
22 their manufacturing operations?

23 A. Yes, sir.

24 Q. Do you remember any specific substances they
25 sent there?

- 1 A. No, sir.
- 2 Q. Okay. How about oily rags or cans with oils or
3 greases in them?
- 4 A. No, sir.
- 5 Q. Do you recall anything else about Foamcraft's
6 waste? I'm sorry, Foamex Products' waste.
- 7 A. No, sir.
- 8 Q. What size container did they have?
- 9 A. I think they had a 48-yard also.
- 10 Q. How frequently was that emptied?
- 11 A. I would say a couple times a week. There again,
12 it depends on how good the trailer business was.
- 13 Q. Right.
- 14 A. There were ups and downs in this business.
- 15 Q. Sure. The next customer I have is Franger Gas
16 Company, 1530 West Bristol.
- 17 A. Yes.
- 18 Q. What company or what business was Franger Gas
19 Company involved in?
- 20 A. They're a bottled-gas company. They fill the
21 bottle gas tanks for mobile homes or whatever,
22 grills, gas grills.
- 23 Q. They provide the gas?
- 24 A. Uh-huh.
- 25 Q. Did they dispose of their waste at the landfill?

1 A. Yes.

2 Q. What types of waste did they send there?

3 A. I really never recall them ever throwing away a
4 gas tank itself. And I believe they had a 2- or
5 3-yard container up there mostly for their
6 office paper and trash and boxes. I would say
7 they were a small --

8 Q. Okay. The next company I have is Franklin
9 Press, Inc., 56850-B Elk Park Drive.

10 What business was Franklin Press in?

11 A. They were in the printing business.

12 Q. Did Franklin Press dispose of their waste at the
13 County Road 10 Landfill?

14 A. Yes.

15 Q. And you're familiar with the waste they sent
16 there?

17 A. Yes.

18 Q. And what type of waste did they send there?

19 A. Well, here again, I recall it wasn't too big. I
20 think they had a 4-yard container, and I'm sure
21 they had a few ink products and maybe dyes for
22 printing out whatever they printed up for you.

23 Q. So do you believe they disposed of inks and dyes
24 at the County Road 10 Landfill?

25 A. Yes.

1 Q. How about materials for cleaning, industrial
2 cleaning fluids or solvents?

3 A. Yes.

4 Q. Okay. Pigments, did they dispose of any
5 pigments at the site?

6 A. I'm not sure.

7 Q. Okay. Do you recall any other wastes disposed
8 of by Franklin Press at the County Road 10
9 Landfill?

10 A. No.

11 Q. You mentioned they had a 4-yard container. How
12 frequently was that emptied?

13 A. Probably on a once a week basis.

14 Q. The next customer I have is G and B Plastics,
15 700 West Beardsley.

16 Do you know that company?

17 A. I do not recall, no, sir.

18 Q. The next company I have is GTE North, Clinton
19 Street possibly.

20 Do you know that company?

21 A. Yes.

22 Q. What business was GTE North in?

23 A. That's the telephone company.

24 Q. Did GTE send their waste to the County Road 10
25 Landfill?

1 A. Yes.

2 Q. Are you familiar with the types of waste they
3 sent there?

4 A. Yes.

5 Q. And what types of waste did GTE send to County
6 Road 10?

7 A. Okay. Cardboard, the office trash, lots of
8 telephone wire from coming down in storms and
9 whatever, and probably guy wires for telephone
10 poles.

11 Q. Did they dispose of any old telephone poles?

12 A. No.

13 Q. Do you recall any other sorts of electronic
14 equipment or telephone equipment that they
15 disposed of at the landfill?

16 A. No. It runs in my mind we'd get broken
17 insulators and things like that but not so much
18 of the telephone equipment itself. We would
19 even get some old telephones.

20 Q. Do you recall any other wastes from GTE that
21 were disposed of at the landfill?

22 A. No.

23 Q. What size container did GTE have?

24 A. I think they had a 16 there.

25 Q. And how often was that emptied?

1 A. I think about once a week.

2 MR. OSLAN: Why don't we go out for a
3 couple minutes.

4 (Whereupon a short recess was
5 taken.)

6 BY MR. OSLAN:

7 Q. The next customer I have is Gano Plywood, 1334
8 West Wolf.

9 A. Yes, sir.

10 Q. What business were they in?

11 A. They were a plywood -- they had plywood, they
12 had lumber, they had roofing, they had -- they
13 were just a lumber company, I would call them.

14 Q. Were they primarily a distributor?

15 A. Right.

16 Q. Okay. And did they dispose of their waste at
17 the County Road 10 Landfill?

18 A. Yes, sir.

19 Q. Are you familiar with the types of waste they
20 sent there?

21 A. Yes, sir.

22 Q. What did Gano Plywood send to the County Road 10
23 Landfill?

24 A. A lot of skids, a lot of banding. Probably they
25 might have thrown away a bucket or two of

1 banged-up tar.

2 Q. How about glues or epoxies?

3 A. No.

4 Q. Do you recall anything else specific about their
5 waste disposal?

6 A. No.

7 Q. What size container did they have?

8 A. I believe they had a 16-yard there.

9 Q. And how often would that be emptied?

10 A. I think they were on a call-in basis. So if it
11 averaged once a week, it would have probably
12 been a lot.

13 Q. Are they still in business?

14 A. No.

15 Q. The next company I have is Gaska-Tape, Inc.,
16 1810 West Lusher Avenue.

17 Do you know that firm?

18 A. Yes.

19 Q. What business are they in?

20 A. They were a foam tape manufacturer. They would
21 -- now, to say that they actually made the foam
22 tape there, I believe they did. But they would
23 cut it -- it would come in rolls, and they would
24 cut it this wide, this wide, this wide, and then
25 you had this -- oh, like wax paper on there, and

1 you could take and pull that paper off and then
2 you could stick it around the edge of the door
3 or window and --

4 Q. So they manufactured this foam with the adhesive
5 back?

6 A. Right, right.

7 Q. And they would cut it to various widths?

8 A. (Witness nods head.)

9 Q. Did Gaska-Tape dispose of their waste at County
10 Road 10?

11 A. Yes.

12 Q. What types of waste did they dispose of there?

13 A. I know that they threw away lots of that foamy
14 type tape stuff, and there again, they probably
15 threw away the skids and some banding.

16 Q. Did they actually place the adhesive, the
17 adhesive strip, on?

18 Or maybe a better question is did they
19 dispose of the adhesive at the landfill as well?

20 A. I'm not sure.

21 Q. Okay. Did they dispose of oily rags or greases,
22 anything like that?

23 A. If I sit here and think about it, it seems to me
24 like they did throw away some cans that had
25 something in them. And they were gallon cans,

1 and they were silver with white letters on
2 them. But to say that I recall exactly --
3 exactly what it said on the can, I can't.

4 Oily rags, I really can't remember
5 that so much either.

6 Q. The silver gallon cans, was it your
7 understanding or do you believe that that
8 contained some sort of chemical?

9 A. Yes. I believe it was a cleaner of some kind.

10 Q. Okay. An industrial cleaner?

11 A. (Witness nods head.)

12 Q. And were there residues in these cans?

13 A. Yes.

14 Q. What size container did Gaska-Tape have?

15 A. I believe they started out with either a 16- or
16 22-yard, and then I believe eventually they got
17 up to maybe a roll-off container.

18 Q. Are they still in business, Gaska-Tape?

19 A. I'm not sure.

20 Q. During the time period that you were taking
21 their waste to the landfill, was any other
22 company involved in picking up their waste?

23 A. Not to my knowledge, no.

24 Q. The next customer I have is Gelco Truck Leasing,
25 2220 Toledo Road.

1 A. Yes, sir.

2 Q. What business are they in?

3 A. They're in the truck-leasing business. They
4 have a full-service garage for truck maintenance
5 out there.

6 Q. Okay. Are they still in business?

7 A. I think so, yes.

8 Q. Did Gelco dispose of its waste at County Road
9 10?

10 A. I do not think so, no. I think they come along
11 afterwards.

12 Q. The next customer I have is General Electric
13 Appliance Division, 2711 Industrial Parkway.

14 Are you familiar --

15 A. No.

16 Q. -- with that company?

17 A. No, sir.

18 Q. The next customer I have is General Telephone,
19 129 South Second Street.

20 Do you know that company?

21 A. Yes, sir.

22 Q. What business --

23 A. That's the telephone company.

24 Q. They manufacture or --

25 A. No. They just supply the telephone services for

1 this community.

2 Q. That's right, they're the local phone company.

3 And did General Telephone dispose of
4 waste at County Road 10?

5 A. Yes.

6 Q. What types of waste did General Telephone
7 dispose of at County Road 10?

8 A. There again, old telephone wire, probably old
9 telephones, maybe a broken-off telephone pole or
10 two, damaged guy wires. And I know these things
11 they screw into the ground that tie the guy
12 wires to hold the telephone poles taut.
13 Telephone insulators. Maybe some of the old
14 crossbars where the telephone lines run across
15 the telephone pole.

16 Q. Okay. Do you recall anything else?

17 A. And their basic office-type trash.

18 Q. What size container did they have?

19 A. I believe they had a 22-yard container.

20 Q. How often was that emptied?

21 A. I'd say once a week.

22 Q. The next company I have is Georgia Pacific, 223
23 Collins Road.

24 A. Uh-huh.

25 Q. What business were they in?

1 A. They are a warehouser for wood, plywood. They
2 have insulation.

3 Q. Did Georgia Pacific dispose of its waste at
4 County Road 10?

5 A. Yes, sir.

6 Q. Are you familiar with the types of waste that
7 Georgia Pacific disposed of at County Road 10?

8 A. Yes, sir.

9 Q. And what types of waste did they send there?

10 A. A lot of banding, maybe damaged plywood,
11 chipboard, a lot of wood and a lot of these big
12 pieces of paper that -- you probably seen semis
13 going down the road and they got their load all
14 covered up with it. It's a paper coating but
15 it's kind of a black tar in between that paper
16 and then nylon mesh in there where it kind of
17 gives it strength. A lot of that stuff from
18 where they'd get this plywood. They had
19 prefinished plywood and all kinds.

20 Q. Did they dispose of any treated lumber at the
21 site?

22 A. Yes. I'd say yes.

23 Q. Did they have any treating compounds that they
24 would apply?

25 A. Not to my knowledge, no.

1 Q. Do you recall seeing any cans of wood-treatment
2 compounds?

3 A. No, sir.

4 Q. What else do you recall about Georgia Pacific's
5 wastes?

6 A. Not too much.

7 Q. What size container did Georgia Pacific have?

8 A. They had a large container, a 48-yard.

9 Q. How frequently was that emptied?

10 A. There again, probably twice a week.

11 Q. Okay. The next company I have is Gladstone
12 Apartments, 55960 Rivershore East.

13 A. No, I don't recall them.

14 Q. How about Glascoat of Midwest, 720 Collins Road?

15 A. The name sure sounds familiar, but I can't sit
16 here and think of what -- but the name is very
17 familiar.

18 Q. Okay. Well, if it comes back to you as we
19 continue on, just let me know.

20 The next company I have is Golden Rule
21 Press, 2617 Phillips Street.

22 Are you familiar with Golden Rule
23 Press?

24 A. No. There again, the name, yes, I remember
25 here, and if I had to recall, I think they were

1 a printing company.

2 Q. But you don't recall specifically anything about
3 that company?

4 A. I don't recall.

5 Q. Okay. The next company I have is Goodyear Tire
6 Company, 22830 Pine Creek Road.

7 A. There again, it's a blank. No.

8 Q. Okay. The next customer I have is Goshen
9 Implement Company, 404 South 11th Street.

10 Do you know that company?

11 A. Yes, sir.

12 Q. What do they do?

13 A. They're the international dealership of Goshen
14 for farm equipment.

15 Q. Did Goshen Implement Company dispose of their
16 waste at County Road 10?

17 A. Yes, I think so.

18 Q. Do you recall what types of waste they disposed
19 of there?

20 A. Yes. I believe they had a 4-yard container, and
21 I believe there could have been or there were
22 oil filters, air cleaners, oily rags, sweeping
23 compound from cleaning up the floor, possibly
24 little spray cans of paint from touching up
25 things that they worked on.

1 Q. How about solvents?

2 A. Yes.

3 Q. Did they dispose of engine fluids, used engine
4 fluids from the farm equipment?

5 A. There again, I would say no, not like draining
6 oil out of the engine and throwing it in there,
7 but if something spilled on the floor, in the
8 floor sweepings or the rags that they cleaned it
9 up with, I would say yes.

10 Q. Do you recall any other specific wastes sent by
11 Goshen Equipment -- I'm sorry, Goshen Implement
12 Company to County Road 10?

13 A. No, sir.

14 Q. You mentioned they had a 4-yard container. How
15 frequently was that cleaned out?

16 A. I believe that was on a once a week.

17 Q. The next company I have -- let me back up.

18 Is Goshen Implement still in business,
19 do you know?

20 A. Yes, it is. But I believe international was
21 bought out by Case, but I believe it still goes
22 under Goshen Implement. It's still there, I
23 know that.

24 Q. The next customer I have is Gunite Corporation,
25 Plant #1.

1 Do you know that company?

2 A. Yes.

3 Q. What do they do?

4 A. They make wheel stampings, I believe.

5 Q. Did Gunite Corporation dispose of its waste at
6 County Road 10?

7 A. Yes, I believe they did.

8 Q. And are you familiar with the types of waste
9 that Gunite Corporation shipped to County Road
10 10?

11 A. Yes.

12 Q. What types of waste did Gunite Corporation
13 dispose of at County Road 10?

14 A. Mostly paint. I believe they had a drip tank
15 where they dipped these wheels into. And rags
16 and paper and wood, probably some banding
17 material.

18 Q. Was there some sort of fluid from the dip tank
19 that they disposed of at the landfill?

20 A. Not to my knowledge. It runs in my mind that
21 they had paper laid on the floor, and as this
22 stuff dripped, it fell onto the paper, and then
23 as it dried out, they picked it up and threw it
24 into the container.

25 Q. Okay. Did they use solvents and dispose of

1 solvent wastes at the landfill?

2 A. Not to my knowledge, but yet I feel they did
3 because if you're going to paint, you got to
4 clean things so --

5 Q. Right. Okay. How about oily rags?

6 A. Yes.

7 Q. Did they use any degreasers and dispose of
8 degreaser waste?

9 A. Not in a liquid-type form, but there again, if
10 they swept the floor or mopped it up, I'm sure
11 that there could have been some residue on
12 whatever they done that with.

13 Q. Do you recall anything else about Gunite's
14 waste?

15 A. No.

16 Q. What size container did Gunite have?

17 A. I believe they had a 16-yard.

18 Q. What was the frequency of cleaning out that
19 container?

20 A. I don't believe -- there again, it depends on
21 what -- once a week I think would be plenty. It
22 would depend on what the trailer industry was
23 doing. They had their ups and downs, I
24 believe.

25 Q. Okay. Are you aware of any other companies that

1 were picking up Gunite's waste during that time
2 period?

3 A. No, sir.

4 Q. The next customer I have is Hadco Engineering
5 Company, 2506 Middlebury.

6 Do you know that company?

7 A. No, sir. The name sounds familiar, but no,
8 sir.

9 Q. The next customer is Harman Lumber and Supply,
10 202 Sunocco Street.

11 A. No, sir.

12 Q. You don't recall them?

13 A. No.

14 Q. The next company I have is Hartson-Kennedy Co.,
15 Inc., 2635 West Mishawaka.

16 A. Yes, sir.

17 Q. You are familiar with that company?

18 A. Yes, sir.

19 Q. What business are they in?

20 A. They made Formica countertops for the RV
21 business.

22 Q. And did Hartson-Kennedy Co. dispose of its waste
23 at County Road 10?

24 A. Yes.

25 Q. And are you familiar with the types of waste it

- 1 sent there?
- 2 A. Yes.
- 3 Q. Okay. What types of waste did Hartson-Kennedy
4 send to the landfill?
- 5 A. Pieces of Formica where they cut out for sinks
6 and so on. And they had some glue barrels, they
7 had wood, and they had chipboard.
- 8 Q. Did the glue barrels have glue residues in them?
- 9 A. Yes.
- 10 Q. Did they dispose of epoxies at the landfill?
- 11 A. I would say yes.
- 12 Q. Okay. Do you recall whether they used any
13 solvents?
- 14 A. No.
- 15 Q. Did they dispose of any industrial cleaners --
- 16 A. No.
- 17 Q. -- at the landfill?
- 18 A. (Witness shakes head.)
- 19 Q. How about paints or lacquers?
- 20 A. No, I don't think so.
- 21 Q. Okay. Do you recall any other wastes generated
22 by Hartson-Kennedy that were disposed of at the
23 landfill?
- 24 A. No.
- 25 Q. What size container did they have?

1 A. They had a roll-off box, probably a 42-yard open
2 top.

3 Q. How often was that cleaned out?

4 A. I would say on the average of once a week.

5 Q. The next customer I have is Heilman Heating and
6 Air Conditioning, 911 Plum Street.

7 A. Yes.

8 Q. Do you know that company?

9 A. Yes, sir.

10 Q. What do they do?

11 A. They were a heating and air conditioning service
12 center. They sold and serviced heating and air
13 conditioning. I believe you could even get hot
14 water heaters there.

15 Q. Did Heilman Heating and Air Conditioning dispose
16 of its waste at County Road 10?

17 A. Yes.

18 Q. And what types of waste did they dispose of
19 there?

20 A. They had -- they had a lot of old heat ducts
21 where they put in new furnaces and the same
22 thing for air conditioners, and they had the
23 parts that they had taken off of furnaces that
24 needed repair. And they had some skids and some
25 cardboard. And their office was right there

- 1 also, so the office-type paper was thrown in.
- 2 Q. Did they throw away old air conditioners or
- 3 appliances?
- 4 A. Yes.
- 5 Q. And did they throw away old hot water heaters?
- 6 A. Yes.
- 7 Q. Do you recall any other types of waste they
- 8 threw away?
- 9 A. No.
- 10 Q. What size container did they have?
- 11 A. A 16-yard.
- 12 Q. How frequently was that cleaned out?
- 13 A. I think that was on a strictly call-in basis.
- 14 So whenever they called, we hauled.
- 15 Q. Okay. Any average?
- 16 A. I'd say probably in the winter months, probably
- 17 on an average of maybe once a week, and in the
- 18 -- if things slowed down in the summertime, you
- 19 know, it might go for two weeks at a time.
- 20 Q. The next customer is Henkels & McCoy, Inc., 1800
- 21 Johnson.
- 22 Do you know that company?
- 23 A. Yes, sir.
- 24 Q. What do they do?
- 25 A. They're in the communications, and they have a

1 little bit of all kinds of equipment from
2 trenching machines to pole setters. And they
3 had their own little maintenance garage up
4 there, and they had several trucks. And here
5 again, they were about like the telephone
6 company, they would have a lot of old wire, they
7 would have oily rags, they would have oil
8 filters, air cleaners, guy wires, maybe a
9 broken-off post or two once in a while.

10 Q. Did they dispose of all those wastes at the
11 landfill?

12 A. Yes, sir.

13 Q. And are you aware of any other companies that
14 were disposing or picking up their waste at that
15 time?

16 A. No, sir.

17 Q. Okay. You said they were doing truck
18 maintenance. Did they dispose of fluids from
19 truck engines?

20 A. No, not -- not by the gallons, but I'm sure that
21 if it spilled on the floor and they cleaned it
22 up, it was in the residue.

23 Q. All right. What size container did they have?

24 A. I think Henkels & McCoy had a 16-yard.

25 Q. How frequently was that emptied?

1 A. There again, I think they were a customer that
2 was on a call-in basis, so I'm going to guess at
3 once every two weeks.

4 Q. The next customer I have is Hermaseal Company,
5 1101 Lafayette.

6 Do you know that company?

7 A. Yes, sir.

8 Q. What do they do?

9 A. They made electric switches.

10 Q. Okay. Did Hermaseal dispose of its waste at
11 County Road 10?

12 A. Yes, sir.

13 Q. Are you familiar with the types of waste that it
14 sent there?

15 A. Yes, sir.

16 Q. And what types of waste did they send to County
17 Road 10?

18 A. There again, I don't know what you call --
19 they're little plastic things that they put the
20 switch in and run the wires through and you kind
21 of rivet it together. Little plastic pieces.

22 Q. Connectors or something?

23 A. Yeah. I don't know what you really call it but
24 -- and also it runs in my mind that they started
25 to make a switch with mercury in it.

1 Q. Mercury switches?

2 A. Uh-huh.

3 Q. Okay. Did they dispose of oily rags?

4 A. Yes.

5 Q. How about degreasers?

6 A. Yes.

7 Q. And solvents?

8 A. Yes.

9 Q. Did they do any painting that you recall?

10 A. Not that I recall, no, sir.

11 Q. Did they get involved in cutting oils, anything

12 like that?

13 A. Not to my knowledge.

14 Q. Okay. Do you recall any other waste disposed of

15 by Hermaseal at the County Road 10 Landfill?

16 A. No, sir.

17 Q. What size container did Hermaseal have?

18 A. I think they had an 8-yard.

19 Q. And how often was that emptied?

20 A. I think they were on a call-in basis.

21 Q. What was the average, if you recall?

22 A. There again, I'd say once in every two weeks.

23 Q. Are they still in business?

24 A. I really don't know. I don't think so.

25 Q. The next customer I have is Holiday World Sports

1 and RV, 2345 Cassopolis Street.

2 Do you know that business?

3 A. No. I mean the name is very familiar, but I
4 can't recall anything about that. In fact, I
5 have my doubts whether they were there in that
6 time frame.

7 Q. Okay. How about Homan Lumber Mart, Inc., 1650
8 West Lusher, are you familiar with that company?

9 A. Yes, sir.

10 Q. Did Homan Lumber Mart dispose of its waste at
11 County Road 10?

12 A. Yes, sir.

13 Q. I assume that's a lumber company?

14 A. Yes, sir.

15 Q. Are you familiar with the types of waste they
16 sent to the landfill?

17 A. Yes, sir.

18 Q. What types of waste did they send there?

19 A. There again, they sent a lot of steel banding,
20 and there's a possibility -- in fact, I'm sure
21 that they they've sent some of the treated
22 lumber that's been damaged in shipment. And
23 they have that paper that I was telling you
24 about where they cover these loads up coming in
25 on a semi.

1 Q. With the tar?

2 A. Uh-huh.

3 Q. I think you mentioned it had tar on it?

4 A. Well, I don't know if it's really tar or not,
5 but it's a black glue where they lay this nylon
6 -- they must lay down a piece of paper, spray it
7 with this contact cement, lay down the nylon
8 mesh on top of that, and put the other piece on
9 top of it. It just gives it strength is what it
10 is.

11 Q. Okay. What other types of materials did Homan
12 Lumber Mart send to the landfill? How about
13 glues or epoxies?

14 A. Not that I can recall, no, sir.

15 Q. Okay. Do you recall anything else about their
16 shipments?

17 A. No, sir.

18 Q. What size container did they have?

19 A. A 16-yard.

20 Q. And when was that emptied?

21 A. I believe -- I believe Homan is still on a
22 call-in basis now so I doubt if -- once every
23 two weeks might be a pretty good figure.

24 Q. The next customer I have is IDC Limited, P. O.
25 Box 145.

1 Do you know that company?

2 A. No, sir.

3 Q. ILC Products Company, Inc., 1800 14th Street, do
4 you know that company?

5 A. Industrial Lamp Company.

6 Q. Industrial Lamp, okay. Are they a manufacturer
7 of lamps?

8 A. No. They were a manufacturer of aluminum. I
9 don't know as they manufactured it. They
10 processed aluminum.

11 And I remember that they had a lot of
12 wood and they had a lot of banding. And that's
13 about all I can tell you about that place. But
14 I do remember ILC.

15 Q. Okay. What size container did they have?

16 A. I believe they had a 48-yard.

17 Q. How often was that emptied out?

18 A. I believe they were on a call-in basis, so I --
19 I don't think they were -- and I don't think
20 they're in business anymore.

21 Q. Okay. The next customer I have is IMC Inc.,
22 1718 Fieldhouse Avenue.

23 A. No.

24 Q. You don't recall that company?

25 A. Uh-uh.

1 Q. The next one is Imperial Fabrics 29031 U.S. 33.

2 A. Yes.

3 Q. What company or what business is that company
4 in?

5 A. They were in the drapery business for the mobile
6 home and RV industry.

7 Q. Okay. Did they dispose of their waste at County
8 Road 10?

9 A. Uh-huh.

10 Q. What types of waste did they send there?

11 A. Mostly remnants, pieces of fabric from making
12 mobile home curtains and thread and these spools
13 that thread comes on. Not a lot.

14 Q. Okay. Did they use --

15 A. They had some office paper.

16 Q. Did they dispose of any glues?

17 A. Not to my knowledge.

18 Q. Do you recall anything else about Imperial
19 Fabrics' waste?

20 A. No.

21 Q. What size container did they have?

22 A. I believe it was a 4-yard. Probably a once a
23 week pickup.

24 Q. Okay. The next company I have is Imperial
25 Finishing Corp., 1001 North Cassopolis Street.

1 Do you know that company?

2 A. No. The name sounds. I'm trying to recall.

3 Q. That's all right. If you recall it as we move
4 ahead, just stop me and we can go back to it.

5 The next one I have is Impressions,
6 Inc., 1227 West Beardsley.

7 Are you familiar with that company?

8 A. Oh, yes.

9 Q. What do they do?

10 A. There again, they're a printing outfit of some
11 kind.

12 Q. Did Impressions, Inc., dispose of their waste at
13 County Road 10?

14 A. I do not believe so, no. I think they came
15 afterwards.

16 Q. Okay. So you believe that they were not in
17 business when County Road 10 was operating?

18 A. That's -- that's my recollection of them.

19 MR. OSLAN: Okay, fair enough.

20 Let's take a short break.

21 (Whereupon a short recess was
22 taken.)

23 BY MR. OSLAN:

24 Q. Mr. Perrin, the next company I have on the
25 customer list is Indiana Michigan Electric

1 Company.

2 Are you familiar with that company?

3 A. Yes, sir.

4 Q. And what business are they in?

5 A. The power company for this part of the country.

6 Q. Okay. Did Indiana Michigan Electric dispose of
7 its waste at the County Road 10 Landfill?

8 A. Yes.

9 Q. Are you familiar with the types of waste that I
10 & M disposed of at the landfill?

11 A. Yes.

12 Q. And would you tell me what types of waste they
13 sent there.

14 A. Well, lots of electrical wire. Probably a few
15 broken-off I & M electric poles, guy wires for
16 those poles.

17 They have a maintenance garage. I'm
18 sure we received some of their oil filters and
19 so on out of trucks.

20 Q. Did they send waste to the site that included
21 automobile or truck engine fluids?

22 A. I would say yes.

23 Q. And how about solvents?

24 A. Yes.

25 Q. Did they dispose of degreasers at the landfill?

1 A. There again, I would say yes.

2 Q. Okay. How about any transformers or capacitors,
3 anything like that?

4 A. Transformers I can not recall. Electrical -- I
5 don't know what you call them. Big round glass
6 insulator-type things, yes.

7 Q. Electrical boxes, that kind of thing?

8 A. Yes. I think there were some old electrical
9 boxes that would have gone through there, yes.

10 Q. Okay. Do you recall anything else about I & M
11 disposing of waste at the site?

12 A. Yes. They at one time brought two 16-yard
13 containers out there and they were filled with
14 some kind of parts, and they wanted them dumped
15 and buried at the time. But to say exactly what
16 they were, I do not recall. But it run in my
17 mind there was copper on a lot of it.

18 Q. Okay. These were electrical components or
19 electrical parts of some sort?

20 A. Right.

21 Q. And they disposed of two 16-yard containers
22 containing exclusively those types of materials?

23 A. It seems like they were of different types, like
24 maybe some of them were switches that you pull
25 down like so. And I don't recall. I was

1 relatively new there. I know I made a special
2 hole and we dumped them in and covered them up
3 right away.

4 Q. Okay.

5 A. And I believe at the time they said that they
6 didn't want anybody getting the copper.

7 Q. Okay. Approximately what year did that event
8 occur?

9 A. I would say in '69.

10 Q. Okay. Do you recall anything else about I & M's
11 wastes that were disposed of at the landfill
12 other than what you've discussed?

13 A. I believe that's basically it.

14 Q. Okay. What size container did they have?

15 A. They had a 16-yard and I think they also had a
16 2- or 3-yard there at the office.

17 Q. And how often was the 16-yarder emptied?

18 A. I think it was on a call-in basis.

19 Q. So on the average how often would that have
20 been?

21 A. I'd say it would have been about once every two
22 or three weeks. Maybe their front-end loader
23 container they might have had done on a weekly.
24 I don't know.

25 Q. The next customer I have is Indiana Plastics

1 Corp. 2221 Industrial Parkway.

2 A. Uh-huh.

3 Q. Do you know that company?

4 A. Yes.

5 Q. What do they do?

6 A. They're a plastic extrusion company.

7 Q. Did Indiana Plastics Corp. dispose of its waste
8 at County Road 10?

9 A. Yes.

10 Q. Are you familiar with the types of waste it sent
11 there?

12 A. Yes.

13 Q. What types of waste do you recall them sending?

14 A. Well, there again, that's big globs of plastic
15 where they started up the machine or shut it
16 down or finished up. And it had little --
17 little bitty cubes of plastic that they would
18 heat up to melt to make the extrusion, and they
19 could have been red, green, yellow, whatever.
20 And they might have threw away boxes and boxes
21 of this stuff at a time, these little pellets.

22 Q. Okay. Did they dispose of glues or epoxies?

23 A. It's possible, but I couldn't say for sure.

24 Q. Okay. You mentioned different color plastics,
25 so did that mean that they were coloring it at

1 their facility with pigments or paints?

2 A. No. I think the little drop or whatever they
3 used already had the color in it, and just by
4 heating it up it made -- not that they actually
5 put it in there. I don't know.

6 Q. Did they use and dispose of solvents?

7 A. Not to my knowledge.

8 Q. Did they dispose of any machining oil or
9 degreasers?

10 A. Not to my knowledge.

11 Q. Do you recall anything else about Indiana
12 Plastics Corp. sending particular wastes to the
13 site?

14 A. No, sir.

15 Q. What size container did they have?

16 A. I believe they had about a 30-yard container.

17 Q. How often was that emptied?

18 A. I would say on maybe an average of once a week.

19 Q. The next company I have has a very similar name
20 to the one that we just discussed. This is
21 Indiana Plastics, Inc. 57500 County Road 3.

22 Do you know that company?

23 A. Yes, sir.

24 Q. What business is Indiana Plastics, Inc., in?

25 A. I believe -- I believe they were basically in

1 the same business that Indiana Plastics
2 Corporation was in.

3 Q. Okay.

4 A. They were extrusion, and I believe they had the
5 same type of waste.

6 Q. Okay. So Indiana Plastics disposed of its waste
7 at County Road 10?

8 A. Yes, sir.

9 Q. And they disposed of plastics, plastic scraps;
10 is that right?

11 A. Uh-huh.

12 Q. And solvents?

13 A. Uh-huh.

14 Q. And how about glues or epoxies?

15 A. I'm not sure, but I don't think so.

16 Q. Okay. Machining oil?

17 A. I'm sure they had to do -- in floor sweepings
18 I'm sure there must have been. Because with all
19 of these machines -- I've seen them. It's kind
20 of unbelievable. And I'm sure they had to have
21 maintenance on all these machines that run this
22 stuff through there.

23 Q. Okay. And do you recall them disposing of
24 degreasers?

25 A. Not really, no, sir.

- 1 Q. Okay. What size container did Indiana Plastics
2 have?
- 3 A. They had either a 30- or a 42-yard. They had a
4 roll-off container also.
- 5 Q. How often was their container emptied?
- 6 A. I would say on an average of once a week.
- 7 Q. The next customer I have is Inland Distributors
8 of Elkhart, Inc., 1745 Conant Drive.
9 Do you know that company?
- 10 A. Yes, sir.
- 11 Q. What do they do?
- 12 A. They were a mobile home distribution outlet for
13 a lot of the mobile home factories, I guess.
- 14 Q. They were just a distributor?
- 15 A. Right.
- 16 Q. Okay. Did they dispose of their waste at the
17 County Road 10 --
- 18 A. Uh-huh.
- 19 Q. -- Landfill?
- 20 A. Yes, sir.
- 21 Q. What types of waste did they send there?
- 22 A. The biggest thing I can remember about them,
23 they had lots of cardboard and they had lots of
24 wood skids.
- 25 Q. Do you recall anything else about their waste?

- 1 A. No, sir.
- 2 Q. What size container did they have?
- 3 A. They had a 48-yard or 42-yard.
- 4 Q. How often was that emptied?
- 5 A. I would say on an average of once a week. And
- 6 if everything was running good, maybe twice a
- 7 week.
- 8 Q. The next company I have is Instamatic Corp.,
- 9 2323 Middlebury Street.
- 10 Do you know that firm?
- 11 A. Yes.
- 12 Q. What do they do?
- 13 A. They were a warehouser for RV refrigerators.
- 14 Q. Did Instamatic Corp. dispose of its waste at
- 15 County Road 10?
- 16 A. Yes.
- 17 Q. Are you familiar with the waste they sent there?
- 18 A. Yes, sir.
- 19 Q. What types of waste did Instamatic Corp. send to
- 20 County Road 10?
- 21 A. Mostly -- mostly skids and banding and boxes
- 22 and --
- 23 Q. Did they send refrigerator parts, damaged
- 24 refrigerators, anything like that?
- 25 A. Yes, I believe they had sent a damaged

- 1 refrigerator or two up there.
- 2 Q. So from time to time they did send either an
- 3 entire refrigerator or refrigerator parts?
- 4 A. Yes, a door or --
- 5 Q. Do you recall anything else about Instamatic
- 6 Corp.?
- 7 A. No, sir.
- 8 Q. What size container did they have?
- 9 A. I think they just had a 16-yard.
- 10 Q. How often did they empty that?
- 11 A. I believe they were on a call-in basis. I'd say
- 12 on an average of once every two weeks.
- 13 Q. The next company I have is Instant Copy, 201
- 14 West Marion Street.
- 15 A. Uh-huh.
- 16 Q. What do they do?
- 17 A. It's just a place -- if you want things copied,
- 18 you can walk in there and they'll copy them for
- 19 you.
- 20 Q. One of these franchise copy services?
- 21 A. Yeah, printing.
- 22 Q. Okay. Did they dispose of their waste at County
- 23 Road 10?
- 24 A. Yes.
- 25 Q. What types of waste did they send there?

1 A. Paper, cardboard. And I'm afraid they would
2 have thrown a few ink cans away.
3 Q. So cans with residual ink?
4 A. Right.
5 Q. What size container did they have?
6 A. They had a small container, a 4-yard, I think.
7 Probably a once a week pickup.
8 Q. The next customer I have is International Foam
9 corp., 1500 West Lusher.
10 Do you know that company?
11 A. Yes.
12 Q. What's their business?
13 A. They were kind of a wholesaler for foam rubber.
14 Q. Did they manufacture or --
15 A. No.
16 Q. -- primarily distribute?
17 A. I think they primarily just distribute.
18 Q. Okay. Did they dispose of their waste at County
19 Road 10?
20 A. Yes.
21 Q. What sorts of waste did they dispose of there?
22 A. The biggest thing I can remember, they had some
23 foam scraps and they had a lot of cardboard.
24 Q. Okay. Banding?
25 A. Yes, some.

1 Q. Do you recall anything else about their waste?

2 A. No, I cannot.

3 Q. What size container did they have?

4 A. I think -- I think they had a 16-yard.

5 Q. And how frequently was that emptied?

6 A. Probably about a once a week basis. There
7 again, depending on how business was in the
8 trailer industry.

9 Q. The next company I have is J.C. Penney Company,
10 3701 South Main.

11 Did J.C. Penney ship its waste to
12 County Road 10?

13 A. Yes, they did.

14 Q. What types of stuff did they send there?

15 A. Mostly boxes, plastic straps that held the boxes
16 shut, maybe some cellophane that were over
17 shirts and jackets. And if somebody returned an
18 old pair of shoes, they'd cut down the side of
19 it and throw it away. And then their regular
20 trash from running the company office.

21 Q. Okay. The next company I have is Jason
22 Industries, Inc., P. O. Box 1434.

23 Are you familiar with that company?

24 A. No. The name sounds familiar, but I can't
25 recall.

1 Q. Okay. The next one I have is Johns-Manville
2 Corporation, 2730 Industrial Parkway.

3 Do you know that company?

4 A. Yes.

5 Q. What do they do?

6 A. Well, they -- at that time they were a pretty
7 big supplier of insulation to the RV industry.
8 Or not the RV but the mobile home industry, RV
9 industry or whatever.

10 Q. And did Johns-Manville dispose of its waste at
11 County Road 10?

12 A. Yes.

13 Q. What types of waste did Johns-Manville send to
14 County Road 10?

15 A. I would get rolls of insulation that were wet or
16 damaged and banding and cardboard and a few
17 skids.

18 Q. Okay. Do you recall anything else about their
19 waste that they sent to the site?

20 A. No, sir.

21 Q. Okay. What size container did they have?

22 A. They had a 42-yard, I believe.

23 Q. And how often was that cleaned out?

24 A. I think they were strictly on a call-in basis.
25 So I would say on the average it would be about

1 once every two weeks.

2 Q. Okay. And the next customer I have is Journey
3 Motor Homes, Inc., 27365 County Road 6 West.

4 Are you familiar with that company?

5 A. Yes, sir.

6 Q. What is their business?

7 A. They were -- Journey Motor Homes is a --
8 manufactured motor homes.

9 Q. Did Journey Motor Homes dispose of its waste at
10 County Road 10?

11 A. Yes, sir.

12 Q. Are you familiar with the types of waste they
13 sent to the site?

14 A. Yes.

15 Q. Okay. Did that include scrap steel and
16 aluminum?

17 A. Yes.

18 Q. Glues and epoxies?

19 A. Yes.

20 Q. Paints, primers, and lacquers?

21 A. Yes.

22 Q. Did they dispose of paint thinners and solvents?

23 A. Yes, at least the residues in the cans.

24 Q. Okay. How about soldering agents and fluxes?

25 A. Yes.

- 1 Q. Okay. Do you recall them disposing of oils and
2 greases at the landfill?
- 3 A. No.
- 4 Q. Okay. How about refrigerants?
- 5 A. No.
- 6 Q. Do you recall them disposing of any glue
7 barrels, you know, empty barrels with residues
8 of glue in them?
- 9 A. Yes, there's a strong possibility of that. And
10 roof coating.
- 11 Q. That's the roof coating that you referred to
12 earlier?
- 13 A. Yes.
- 14 Q. Okay. Do you recall any other types of waste
15 that Journey Motor Homes disposed of at the
16 site?
- 17 A. No. I'm sure they had a lot of skids and
18 cardboard and banding and whatever.
- 19 Q. What size container did they have?
- 20 A. I think they had a 42-yard open top.
- 21 Q. How often was there container emptied?
- 22 A. There again, when they were running good, I'd
23 say once or twice a week.
- 24 Q. Are you aware of any other company that was
25 picking up their waste during that time period?

1 A. No, sir.

2 Q. The next customer I have is K.S. Inc., 52821
3 Dexter Drive.

4 Do you know that company?

5 A. No, sir.

6 Q. The next company I have then is Kaiser Aluminum
7 and Chemical Corp., 2700 Industrial Parkway.

8 Are you familiar with that company?

9 A. Yes, sir.

10 Q. What is their business?

11 A. The only thing I can remember about them is they
12 had a lot of skids and wood and banding and
13 scrap aluminum.

14 Q. Were they a manufacturer?

15 A. I think so.

16 Q. Okay. In their manufacturing operations did
17 they generate oily rags and waste with oil and
18 grease on it?

19 A. Yes, I believe they did.

20 Q. Did they also dispose of degreasers at the
21 landfill?

22 A. Not to my knowledge. It's possible it could
23 have been in like the floor sweepings but --

24 Q. How about solvents?

25 A. There again, it's possible.

1 Q. Do you recall any other types of waste that
2 Kaiser Aluminum disposed of at the County Road
3 10 Landfill?

4 A. No, sir.

5 Q. What size container did they have?

6 A. I think they had a 16-yard.

7 Q. How often was that emptied?

8 A. There again, I think they were emptied at least
9 once or twice a week if things were good.

10 MR. OSLAN: Why don't we take another
11 short break.

12 (Whereupon a short recess was
13 taken.)

14 BY MR. OSLAN:

15 Q. The next customer on the list is Kampco Steel
16 Products, I believe, 57533 R 3 County Road 3
17 South.

18 Do you know that company?

19 A. No.

20 Q. The next company I have is Kasa, K-a-s-a, Supply
21 Corp., 53151 Marina Drive.

22 Do you know that company?

23 A. No.

24 Q. The next company I have is Kegerreis,
25 K-e-g-e-r-r-e-i-s, Supply, 510 South Second

1 Street.

2 Are you familiar with that company?

3 A. Yes.

4 Q. What do they do?

5 A. They're a -- they supply industrial tools to all
6 the trailer companies or anybody that wants
7 them. Air tools, chisels, hammers, you name it,
8 rules, tapes.

9 Q. Okay. Did Kegerreis --

10 A. Kegerreis is the way you pronounce it.

11 Q. Kegerreis. Did they dispose of their waste at
12 County Road 10?

13 A. Yes.

14 Q. What types of waste did they send there?

15 A. I can't recall anything other than paper and
16 cardboard and some skids and maybe some
17 bandings. Nothing --

18 Q. Okay. What size container did they have?

19 A. I believe they just had a 4-yard.

20 Q. How often was that --

21 A. Probably once a week, twice a week at the most.

22 Q. The next company I have is Kellmark Corporation
23 at 53454 Ada.

24 Do you know that company?

25 A. No.

1 Q. The next company I have is Kelsey-Hayes Gunitite
2 Division 56063 County Road 15.

3 A. Yes. They -- they used to make -- and I'm not
4 sure if they're still in business, but
5 Kelsey-Hayes was an axle manufacturer or
6 supplier of axles.

7 Q. Okay. Did Kelsey-Hayes dispose of their waste
8 at County Road 10?

9 A. Yes.

10 Q. Are you familiar with the types of waste that
11 Kelsey-Hayes disposed of at the County Road 10
12 Landfill?

13 A. Yes.

14 Q. What types of waste did they send there?

15 A. Well, they -- I'm sure I had a few of their
16 axles. Now, why I don't know but --

17 Q. Did Kelsey-Hayes dispose of degreasers at the
18 landfill?

19 A. I would say yes.

20 Q. Paint?

21 A. Yes.

22 Q. Cleaning solvents?

23 A. Yes.

24 Q. How about brakes, brake pads, brake parts?

25 A. Yes.

- 1 Q. How about paint thinner?
- 2 A. Yes.
- 3 Q. Oily rags?
- 4 A. Yes.
- 5 Q. Do they do any soldering there, soldering agents
- 6 that you can think of?
- 7 A. Not that I can think of.
- 8 Q. How about scraps of metals?
- 9 A. Yes.
- 10 Q. Can you think of anything else that Kelsey-Hayes
- 11 disposed of at the County Road 10 Landfill?
- 12 A. Well, I'm sure they had the normal steel
- 13 bandings and the wooden pallets and cardboard
- 14 and office-type paper.
- 15 Q. Okay. How large a container did they have?
- 16 A. I believe they had a 16-yard.
- 17 Q. How frequently was that emptied out?
- 18 A. I don't believe it was emptied out any more than
- 19 once a week, if that. Maybe once every couple
- 20 weeks.
- 21 Q. Are you aware of any other companies that were
- 22 picking up their waste at the time that you were
- 23 disposing of their waste --
- 24 A. No.
- 25 Q. -- at County Road 10?

1 The next customer I have is Kelsey
2 Axle Co., 2825 Middlebury Street.

3 Are you familiar with that firm?

4 A. Yes. And to clarify something here a little
5 bit, the Gunite Division of Kelsey-Hayes and the
6 Axle Division of Kelsey-Hayes I think were owned
7 by the same company.

8 Q. Okay.

9 A. And maybe I jumped the gun a little bit because
10 it's the Gunite, I think, that stamped out the
11 wheels.

12 Q. Okay.

13 A. Or the rims.

14 Q. Kelsey Axle, is this related to Kelsey-Hayes?

15 A. It was my impression they were one or both the
16 same company.

17 Q. Okay.

18 A. Two divisions.

19 Q. Okay. So earlier when I was asking you about
20 Kelsey-Hayes' waste, those --

21 A. Kelsey-Hayes -- and I didn't pay attention to
22 the Gunite, and I -- I think I got that a little
23 mixed up.

24 Q. Okay.

25 A. So we can put the two together.

1 Q. Okay. So Kelsey Axle, Kelsey-Hayes Axle
2 Company, sent the material that we talked about
3 a moment ago to the landfill; correct?

4 A. Right, right.

5 Q. And as to Gunitite Division, that was a wheel-
6 stamping --

7 A. That was their wheel stamping for the axles,
8 yes.

9 Q. I believe we discussed Gunitite earlier, so it may
10 be that there was just some duplication on this
11 customer list.

12 A. I think that's true.

13 Q. But in any event, the materials that we talked
14 about did go to the site from Kelsey-Hayes
15 and/or Gunitite?

16 A. Yes, sir.

17 Q. Okay. The next customer I have is Keltec Inc.,
18 2310 Industrial Parkway.

19 Are you familiar with that company?

20 A. No.

21 Q. The next customer is Klem Supply, Inc., South,
22 P. O. Box 356.

23 Do you know that company?

24 A. Yes.

25 Q. What do they do?

1 A. They were -- they were a supplier of drills,
2 router bits, cutting tools for routers, band
3 saws, that type of equipment.

4 Q. Did Klem Auto Supply dispose of its waste at
5 County Road 10? I'm sorry, Klem Supply.

6 A. Yes.

7 Q. Okay. What types of waste did Klem Supply ship
8 to County Road 10 Landfill?

9 A. They would have had skids and basically smaller
10 skids than a full-size skid where the nuts and
11 bolts and drills and cardboard and the paper
12 supplies that -- it's a small place.

13 Q. So they did send used drills or used saws, that
14 type of thing?

15 A. No, no, no. They sent mostly just the --
16 whatever the parts were shipped in to them, the
17 crating.

18 Q. I see. Okay. And do you recall anything else
19 about Klem Supply?

20 A. No.

21 Q. The next customer I have is Klinger Pharmacy,
22 Gateway Shopping Center. Did they send their
23 waste to County Road 10?

24 A. No, I don't think so.

25 Q. The next customer is Kobelco Compressors. Are

1 you familiar with that company?

2 A. The name Arrow Tool rings a bell, but no.

3 Q. Okay. Arrow Tool is the address I have on the
4 exhibit.

5 A. I think that's a misprint. Unless Arrow Tool --
6 I think Arrow Tool was the name of the company
7 and I think they sold Kobelco compressors.

8 Q. But you're not sure?

9 A. I'm not sure, no.

10 Q. The next customer I have is Koch, K-o-c-h,
11 Materials Company, 24087 County Road 6 East.

12 Do you know that company?

13 A. No.

14 Q. Okay. How about Kropf Manufacturing, K-r-o-p-f?

15 A. Yes. They were a mobile home manufacturer on
16 State Road 15.

17 Q. Are they still in business?

18 A. I think the building is still occupied, but I
19 don't believe it's called Kropt anymore.

20 Q. Did Kropf dispose of their waste at County Road
21 10?

22 A. Yes, I think so.

23 Q. Did you become familiar with the types of waste
24 they sent to the County Road 10 Landfill?

25 A. Yes.

1 Q. Did they send scraps of steel and aluminum?
2 A. Yes.
3 Q. How about glue and epoxy wastes?
4 A. Yes.
5 Q. Paints?
6 A. Yes.
7 Q. Primers?
8 A. Yes.
9 Q. Lacquers?
10 A. Yes.
11 Q. Paint thinners?
12 A. Probably, yes.
13 Q. Solvents?
14 A. Yes.
15 Q. Soldering agents and fluxes?
16 A. Yes.
17 Q. How about oils and greases?
18 A. Not so much. There's a possibility in their
19 floor sweepings they could have had some, yes.
20 Q. What other waste did Kropf send to the landfill?
21 A. Well, I'm sure they probably sent a glue barrel
22 or two, and I'm sure they probably sent some
23 5-gallon roof-coating pails.
24 Q. Did those barrels and pails have residues in
25 them?

1 A. Yes.

2 Q. Do you recall any other waste that Kropf
3 Manufacturing sent to the landfill?

4 A. No.

5 Q. What size container did they have?

6 A. I figure they had the 42-yard.

7 Q. How frequently was that emptied?

8 A. In their heyday I would say probably once, twice
9 a week.

10 Q. Are you aware of any other companies that were
11 picking up their waste when you were taking
12 their waste to the landfill?

13 A. No, sir.

14 Q. The next customer I have is L & J Press
15 Corporation, 1641 Sterling.

16 Do you know that company?

17 A. Yes.

18 Q. What do they do?

19 A. They -- they made -- they made these big L & J
20 presses. I remember seeing them setting there.
21 They were gray and they had "L & J" in orange or
22 yellow letters on them. And I think that they
23 bored them out, line bored them, ground them
24 down, got them all ready to put together.

25 Q. Did L & J dispose of their waste at the County

1 Road 10 Landfill?

2 A. Yes.

3 Q. Are you familiar with the types of waste they
4 sent there?

5 A. I would say mostly drillings.

6 Q. Is that metal shavings?

7 A. Right.

8 Q. How about paint or paint waste?

9 A. Yes, I think -- yes.

10 Q. Did they use degreasers or solvents?

11 A. Yes.

12 Q. And did they dispose of those types of waste at
13 the landfill?

14 A. Yes.

15 Q. How about paint thinner?

16 A. I would say yes.

17 Q. Oily rags, grease?

18 A. Yes.

19 Q. Do you recall any other types of waste that L &
20 J disposed of at the landfill?

21 A. None other than cardboard and skids and banding
22 material.

23 Q. What size container did they have?

24 A. I believe they had a 42-yard container.

25 Q. With what frequency was that emptied?

1 A. I would say probably once every two weeks.

2 Q. Are you aware of any other companies that were
3 picking up their waste during that time period?

4 A. No, sir.

5 Q. The next customer I have is LRV Corporation,
6 formerly Delta Formed Products, 700 Lunar
7 Drive.

8 Do you know that company?

9 A. The Delta Formed Products rings a bell, but no,
10 I can't recall.

11 Q. Okay. The next customer I have is LaBour Pump
12 Company, 1607 Sterling Avenue.

13 A. Yes.

14 Q. Do you know them?

15 A. Yes.

16 Q. What do they do?

17 A. They -- they have a small foundry and they have
18 foundry sand. And they were a manufacturer of
19 water pumps.

20 Q. Okay. Did LaBour Pump Company dispose of its
21 waste at the County Road 10 Landfill?

22 A. Yes, sir.

23 Q. Do you know the types of materials they disposed
24 of there?

25 A. Yes. The thing I remember most is that they

1 would have -- I believe it was an 8-yard
2 container of foundry sand every so often.

3 Q. Did they dispose of wastes including degreasers?

4 A. Not to my knowledge.

5 Q. How about solvents?

6 A. Not to my knowledge.

7 Q. Okay. Did they do any painting there?

8 A. Not to my knowledge.

9 Q. Do you recall anything else about the types of
10 waste that LaBour Pump Company sent to the site?

11 A. No, sir.

12 Q. How about pumps?

13 A. No, sir, I do not. I did not.

14 Q. Okay.

15 A. Just mostly the foundry sand.

16 Q. How often was that 8-yard container emptied?

17 A. Not too often. I would say maybe once every
18 two, three weeks.

19 Q. Are you aware of any other company that was
20 picking up their foundry sand at that time?

21 A. No, sir.

22 Q. The next customer I have is LaSalle-Deitch
23 Company, 725 Industrial Parkway.

24 Do you know them?

25 A. Yes.

1 Q. What business are they in?

2 A. They were a wholesaler for RV supplies. And
3 they also handled carpet.

4 Q. Are they still in business?

5 A. I think they sold out. I think the business
6 might be out there, but it might not be under
7 LaSalle-Deitch.

8 Q. Did LaSalle-Deitch dispose of its waste at the
9 County Road 10 Landfill?

10 A. Yes.

11 Q. What types of materials did they dispose of out
12 there?

13 A. The thing I remember the most about it is that
14 we would get carpet from them.

15 Q. Do you recall anything else? Skids and banding,
16 I suppose?

17 A. Yes. Cardboard.

18 Q. What size container did they have?

19 A. I think they had a 16-yard.

20 Q. How often was that emptied?

21 A. It seems to me like they might have dumped that
22 a couple times a week. It just depended on how
23 the carpet business was.

24 Q. Okay. The next customer I have is S & H Leggitt
25 Co., 603 Industrial Parkway.

1 Do you know that company?

2 A. Yes.

3 Q. What do they do?

4 A. They were in the wheel and axle business.

5 Q. Were they a manufacturer or --

6 A. Yes.

7 Q. Are they still in business?

8 A. I do not know.

9 Q. Okay. Did S & H Leggitt Co. dispose of its
10 waste at County Road 10?

11 A. Yes.

12 Q. Are you familiar with the types of waste they
13 disposed of there?

14 A. Yes. Again they had bandings. And I also
15 believe that they had some possible paint
16 drippings from painting the axles.

17 Q. How about paint cans with residues?

18 A. Yes.

19 Q. Did they use solvents?

20 A. Yes.

21 Q. Did they dispose of solvent waste at the
22 landfill?

23 A. Yes.

24 Q. Okay.

25 A. I would say the cans, not that they poured --

- 1 Q. They didn't send --
- 2 A. No, sir.
- 3 Q. -- full barrels?
- 4 A. Right.
- 5 Q. But the cans, the solvent cans, had residues in
- 6 them that they disposed of at the site?
- 7 A. Yes.
- 8 Q. How about oily rags or --
- 9 A. Yes, sir.
- 10 Q. -- rags with solvents on them?
- 11 A. Yes.
- 12 Q. Degreasers?
- 13 A. Yes, sir.
- 14 Q. Paint thinner?
- 15 A. Yes, sir.
- 16 Q. How about metal shavings or metal pieces?
- 17 A. I don't recall. I don't recall that.
- 18 Q. They didn't do any plating, hydroplating?
- 19 A. No, I don't believe so.
- 20 Q. Do you recall any other waste that S & H Leggitt
- 21 disposed of at the site?
- 22 A. No, sir.
- 23 Q. What size container did they have?
- 24 A. I believe they had a 16-yard.
- 25 Q. And how frequently did they empty that?

1 A. I would say if we done it once a week, we did
2 good.

3 Q. Were there any other companies that were picking
4 up their waste during that time?

5 A. Not to my knowledge.

6 MR. OSLAN: Why don't we go off the
7 record.

8 (Whereupon the statement was
9 adjourned at 4:25 p.m.)

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